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September 18, 2020

Mr. Peter Campbell, Environmental Program Specialist
Division of Spill Prevention and Response, Contaminated Sites Program
Alaska Department of Environmental Conservation
43335 Kalifornsky Beach Road, Suite 11
Soldotna, AK 99669

RE: Response to ADEC Review Comments & Work Plan Requirements
on the 2019 Annual Site Status Report
ADEC Hazard ID: 313
Chevron USA Refinery-Nikiski

Dear Mr. Campbell:

This letter addresses the ADEC comments and concerns expressed in the *ADEC Review Comments and Work Plan Requirement* letter dated May 12, 2020, regarding the former Chevron Kenai Refinery (site) in Nikiski, Alaska. We have compiled your comments below in italics, with our responses and plan of action following each comment.

1. Beach Zone Cross-Section

***ADEC Comment:** In order to understand the flow dynamics of the beach zone, ADEC request that cross sections and groundwater contour maps present the subsurface portion of the sea wall. The cross section should show the top and bottom elevation of the sea wall as well as the air sparge wells, temporary beach wells and beach tide elevations. Groundwater contour maps and top of clay map should show the extent of the subsurface sea wall as an aid in understanding the dynamics of subsurface flow.*

Chevron Response: Chevron created Figure 1, South End Rock Revetment Cross-Section, to better demonstrate the flow dynamics of the beach zone. The cross-section includes sea wall elevations, the projected clay layer elevation, approximate groundwater elevations, beach tide elevations, air sparge wells, monitoring wells, temporary beach wells, and beach seep locations within this vicinity.

Chevron will display the extent of the subsurface sea wall on the 2020 Groundwater Surface Elevation Figure and the Topography of Lower Clay Aquitard Figure, included in the 2020 Annual Site Status Report.

2. Beach Monitoring Well

***ADEC Comment:** The beach seeps may not represent the full extent of hydrocarbon impacts crossing the high tide line to the ocean as demonstrated by the temporary beach monitoring well results from wells installed in 2018. Chevron will install a monitoring well to verify the air sparge system is treating beach groundwater concentrations at depth and that the beach is not being impacted.*

Chevron has proposed installing only one temporary beach monitoring well this year rather than the three previously discussed. ADEC agrees to this plan at the approximate location of well TBW-03. If contamination is discovered at this location, additional wells will be required to determine the extent.

Chevron Response: Chevron installed one temporary monitoring well, TBW-4, on July 21, 2020. The monitoring well was installed downgradient and to the west of the previous TBW-3 location. The well location is presented on Figure 1, South End Rock Revetment Cross-Section. This location was sampled in August 2020 and will be sampled tri-annually or until damaged by the ocean. If contamination is discovered at TBW-4, additional wells may be installed to determine the extent of contamination.

If you have any questions regarding this submittal, please call me at (925) 842-5845 or Cassady Birdsong at (307) 745-7474.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jean Wong', is positioned above the typed name and title.

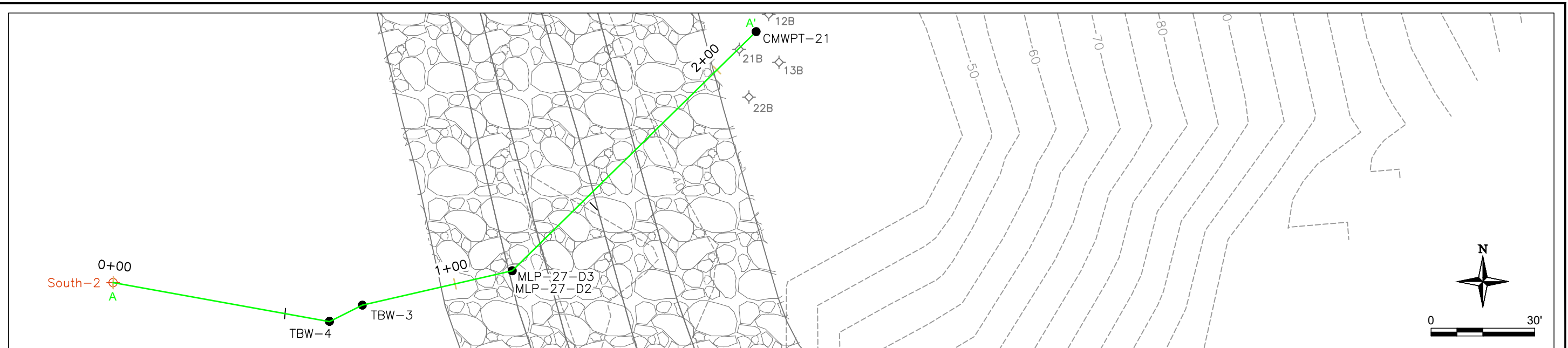
Jean Wong
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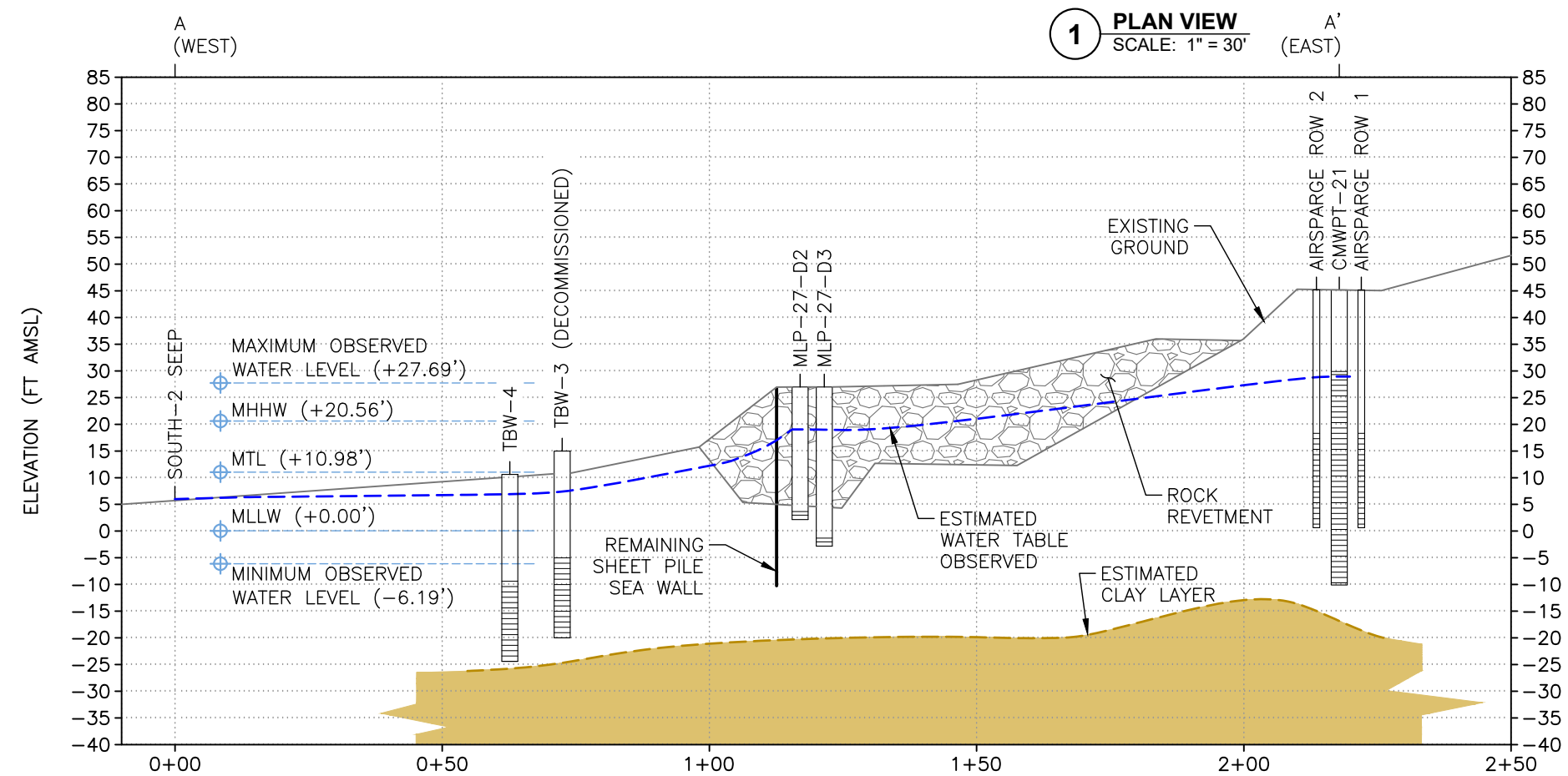
Attachment

cc: Cassady Birdsong, Trihydro

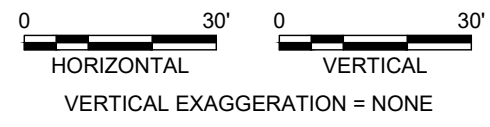
FIGURE



1 PLAN VIEW
SCALE: 1" = 30'



A CROSS SECTION A-A'
SCALE: V = 1" = 30' H = 1" = 30'



EXPLANATION	
	WELL DESIGNATION
	WELL
	SCREENED INTERVAL
	MONITORING WELL AND DESIGNATION
	AIR SPARGE WELL LOCATION AND DESIGNATION
	SURFACE SEEP AND DESIGNATION
	ESTIMATED WATER TABLE OBSERVED
	ESTIMATED CLAY LAYER
	CROSS-SECTION A-A'
	EXISTING CONTOURS (INTERVAL = 5')
	ROCK REVETMENT
MHHW	MEAN HIGHER HIGH WATER
MTL	MEAN TIDE LEVEL
MLLW	MEAN LOWER LOW WATER



FIGURE 1
SOUTH END ROCK REVETMENT CROSS-SECTION
CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY
FORMER KENAI REFINERY
NIKISKI, ALASKA

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