

DIVISION OF SPILL PREVENTION AND RESPONSE Contaminated Site Program

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> > File No. 2323.38.014

October 1, 2020

Stephanie Plate Kenai Pipeline Company P.O. Box 3369 Kenai AK 99611

Re: Kenai Pipeline Company 2019 Groundwater Monitoring Report ADEC Report Comments

Mr. Harper:

On April 28, 2020, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the <u>2019 Groundwater Monitoring Report</u>, dated April 22 2020. This document was prepared by Trihydro Corporation. The report is approved. ADEC has the following requirements.

1: Determine if the hydrocarbons present in groundwater at MW-71 are part of the KPL plume or the Chevron plume. Present hydrocarbon speciating data for monitoring wells MW-71, MW-72 and CMW-61 and demonstrate plume origin for MW-71.

2: If supported by the data, it appears that the Pipeline Manifold plume presented on Figure 6 should be extended to include MW-71, comingling with the Chevron plume at CMW-61. Revise the figure as necessary.
3: The new beach wells associated with the beach dock plume (MW-99 and MW-100) should be decommissioned. Prepare a work plan to be submitted for approval.

We will forward comments on well CMW-61 to Chevron to facilitate sharing data to gain an understanding of offsite conditions.

If you have any questions on any aspect of the project, please contact me at (907)-262-3412, or by e-mail at peter.campbell@alaska.gov

Sincerely,

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Peter Campbell Environmental Program Specialist

Electronic copies via e-mail: Brianna Force, Trihydro Corporation