



# United States Department of the Interior

TOP SECRET

IN REPLY REFER TO:  
DAE

FISH AND WILDLIFE SERVICE  
1011 E. TUDOR RD.  
ANCHORAGE, ALASKA 99503

JUL 9 1990

William E. Wade  
President, ARCO Alaska, Inc.  
P.O. Box 100360  
Anchorage, AK 99510-0360

Dear Mr. Wade:

Enclosed for your signature is Amendment Number 4 to the Order By Consent Mitigation Plan governing remediation of the polychlorinated biphenyls within the Swanson River Oil Field on the Kenai National Wildlife Refuge. On May 30, I sent each "Signatory Agency" a draft of the proposed amendment; only ARCO Alaska, Inc. responded substantively. After consulting with our Solicitor, we believe ARCO's proposed changes in the May 30 draft have merit and have incorporated all but one (monitor the test wells annually) into this final version. Mr. Jon Nelson of my staff last week explained the proposed changes to Mr. James A. Ives of your staff; he agreed with the rationale.

Briefly, the enclosed amendment includes the following stipulations and conditions:

1. Ninety (rather than 30) days to begin remediation after the Swanson River Oil Field is permanently shut down, or if contamination is found in any of the monitoring wells. The requirement to begin remediation under Building A if for any reason the field is shut down temporarily for more than 30 days is NOT a condition in this amendment.
2. A period of 120 days to complete the remediation once it begins.
3. Semi-annual sampling of the four monitoring wells. The draft amendment stipulated a quarterly timeframe; ARCO proposed a once a year frequency.
4. An extension of the current Circulating Bed Combustor operation from November 1, 1990 to September 30, 1992.

I ask that you sign the amendment and return it to me for further processing. You will receive a fully executed copy.

Sincerely,

  
Acting Regional Director

Enclosures

AMENDMENT NUMBER FOUR (4)  
to the  
ORDER BY CONSENT  
MITIGATION PLAN - SWANSON RIVER OIL FIELD  
KENAI NATION WILDLIFE REFUGE

This amendment to the above named ORDER BY CONSENT allows ARCO Alaska Inc. and any successors and assignees to leave Polychlorinated Biphenyl contaminated soil in place beneath Building A in the Swanson River oil field until the Swanson River oil field is permanently shut down or until Polychlorinated Biphenyl contamination is shown to have migrated into ground water or beyond Building A. "Permanent shut-down" is defined as field abandonment after all oil and gas production has ceased, and the compressor in Building A is no longer needed.

Mandatory Requirements/Compliance Schedule

1. Remediation of the contaminated soils beneath Building A in the Swanson River unit of the Kenai National Wildlife Refuge shall begin with 90 days after the Swanson River oil field is permanently shut down.
2. Remediation of the contaminated soils under Building A shall commence with 90 days if polychlorinated biphenyls are found in any of the samples from the four monitoring wells located around Building A.
3. Remediation shall be completed within 120 days after the commencement of cleanup activities following the permanent shut down of the Swanson River oil field.
4. Each of the four monitoring wells located around Building A shall be sampled on a semi-annual basis, beginning on June 1, 1990 and continuing until the contaminated soil is remediated.
  - a. The samples shall be analyzed for polychlorinated biphenyls using standard analytical methods used by approved laboratories for determining concentrations of polychlorinated biphenyls in water.
  - b. Reports of the analyses shall be submitted to the signatory agencies and the U.S. Environmental Protection Agency within 30 days of when samples are taken.

5. Cleanup extension request #2, dated June 1988, is hereby rescinded. The new cleanup date, based on the remaining amount of contaminated soil and the projected rate that the Circulating Bed Combustor Unit is able to treat soil, is extended from November 1, 1990 to September 30, 1992.

6. The provisions of the amendment to the ORDER shall obligate this Respondent and all successors and assignees of the Respondent. If the Respondent transfers, sells, assigns, or leases this facility prior to its fulfillment of the provisions of this amendment to the ORDER BY CONSENT, the respondent must incorporate a copy of this amendment to the ORDER into the documents of transfer, sale, assignment or lease, and must provide in those documents that the new owners or lessees will take or lease subject to compliance with this amendment to the ORDER BY CONSENT.

CONCUR:

*Alan G. Thompson*  
Regional Director, U.S. Fish and  
Wildlife Service, Region 7

9 July 1990  
Date

CONCUR:

\_\_\_\_\_  
State Director, Bureau of Land  
Management

\_\_\_\_\_  
Date

CONCUR:

\_\_\_\_\_  
Alaska Department of Environmental  
Conservation

\_\_\_\_\_  
Date

CONCUR:

*HPA*  
Senior Vice President  
ARCO Alaska, Inc.

1/3/92  
Date