



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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File: 2323.38.006

July 29, 2021

James Kiernan  
Chevron Environmental Management Company  
6101 Bollinger Canyon C2102  
San Ramon, California 94583

Re: Chevron USA Refinery-Nikiski  
Per and Polyfluoroalkyl Substances Work Plan  
ADEC Hazard ID: 313  
ADEC Conditional Approval – Report Required

Mr. Kiernan,

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), would like to thank you for submitting the June 30, 2021 Per and Polyfluoroalkyl Substances Work Plan. This work plan was prepared by Arcadis and was received in our office on June 30, 2021. The work plan was approved on July 27, 2021 approved with the following conditions:

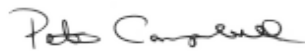
- 1) The work plan states that monitoring wells will not be sampled if LNAPL is present in the well. Our understanding of this scenario is that PFAS can partition into LNAPLs and preferentially to the layer between the product and water, water and air, etc. Sampling the product and the interface is possible and preferable to no sample. Alternatively, sampling additional down gradient wells is an option.
- 2) Alaska requires that the following compounds be reported for water samples collected and analyzed by method USEPA 537:

**PFAS Analytes to be Reported**

<b>Chemical Name</b>	<b>Acronym</b>	<b>CAS Number</b>
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9
Perfluorobutanesulfonic acid	PFBS	375-73-5
Perfluorodecanoic acid	PFDA	335-76-2
Perfluorododecanoic acid	PFDoA	307-55-1
Perfluoroheptanoic acid	PFHpA	375-85-9
Perfluorohexanesulfonic acid	PFHxS	355-46-4
Perfluorohexanoic acid	PFHxA	307-24-4
Perfluorononanoic acid	PFNA	375-95-1
Perfluorooctanesulfonic acid	PFOS	1763-23-1
Perfluorooctanoic acid	PFOA	335-67-1
Perfluorotetradecanoic acid	PFTA	376-06-7
Perfluorotridecanoic acid	PFTTrDA	72629-94-8
Perfluoroundecanoic acid	PFUnA	2058-94-8
11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9
9-chlorohexadecafluoro-3-oxanone-1-sulfonic acid	9Cl-PF3ONS	756426-58-1
4,8-dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4

If you have questions about this letter, or any other aspect of this project, please contact me at (907) 262-3412, or via e-mail at [peter.campbell@alaska.gov](mailto:peter.campbell@alaska.gov)

Sincerely,



Peter Campbell  
Environmental Program Specialist

Cc: Cassidy Birdsong, Trihydro Corporation  
Steve Rice, Arcadis