

December 1, 2018



Tesoro Alaska Company LLC
54741 Tesoro Road
P.O. Box 3369
Kenai, AK 99611

Mr. Peter Campbell
Environmental Program Specialist
Alaska Department of Environmental Conservation
43335 Kalifornsky Beach Road, Suite 11
Soldotna, AK 99669

**RE: Kenai Pipeline Company
Spill # 16239935301
2017 Annual Monitoring Report
ADEC Report Comments**

Dear Mr. Campbell:

Kenai Pipeline Company (KPL) received ADEC's report comments for the 2017 Annual Monitoring Report on November 27, 2018. Responses to comments are provided below.

1) *Alaska Field Sampling Guidance (August 2017) has established the requirement for additional sampling for semi-volatiles organics and PAH compounds. We will require a work plan to establish indicator wells within each plume, which will be sampled for these compounds. These indicators wells should be in source areas and be the most significantly impacted wells in each plume.*

The 2018 Annual Monitoring Report will include the 2019 Groundwater Sampling Plan. This Plan will propose indicator wells within each plume and additional sampling for semi-volatiles organics and PAH compounds will be sampled at those wells in 2019.

2) *Are groundwater elevations measured when the air sparge wells are in operation? Has there been a demonstration on how the monitoring wells are affected by the air sparge wells?*

Historically, the air sparge system has not been shut-down for groundwater elevations or sampling. The system will be shut-down for the 2019 sampling event and any effects or differences noted in the Annual Report.

3) *ADEC has requested that separate phase product present in monitoring wells be removed. Please remove separate phase product and document product quantities recovered and the recharge rates in MW-24 and any other wells with accumulating product.*

Separate phase product in monitoring well MW-24 has been removed monthly beginning in April 2018 utilizing an absorbent sock. The recharge rates will be

reported in the 2018 Annual Monitoring Report. No other KPL wells have separate phase product.

- 4) *Please sample MW-71. This monitoring well has not been sampled since 2000 and this well represents a downgradient monitoring well.*

Monitoring well MW-71 will be added to the 2019 Sampling Plan.

- 5) *Kenai Pipeline will include CMW designated monitoring wells on the ASRC and KPL property. This will allow data from the Chevron site to be interpreted across property boundaries.*

The 2018 Annual Report figures will include nearby CMW wells and utilize a comparable scale.

If you need further information or have any concerns, please contact me at (907) 776-3599.

Sincerely,



Carl Calhoun
Environmental Technician

cc: Stephanie Plate, Trihydro