

EPA TECHNICAL REVIEW COMMENTS
2023 Injection Well Rehabilitation Work Plan
Marathon Kenai Refinery
August 7, 2023

The US Environmental Protection Agency (EPA) has reviewed the *2023 Injection Well Rehabilitation Work Plan, Marathon Kenai Refinery* (the Work Plan), received by EPA on August 1, 2023. The Work Plan was prepared by Brianna Force of Trihydro Corporation for Tesoro Alaska Company, LLC (Tesoro) and dated August 1, 2023.

In general, the scope and schedule for injection wells IR-31 and IR-32 rehabilitation are appropriate. The Well Rehabilitation Procedures presented in Attachment 1 are detailed and comprehensive. The Work Plan is acceptable to EPA pending resolution of the two specific comments discussed below and pending approval by ADEC.

1. Page 1, Purpose and Scope of Work:

The first paragraph of the letter part of the Work Plan states that injection wells IR-31 and IR-32 will be rehabilitated in late August, and injection wells IR-29 and IR-30 will be replaced in early September. However, it is confusing that wells IR-29 and IR-30 are still included in the discussions in the two following sections: Purpose and Scope of Work. The letter Work Plan must be clarified that the scope of injection well rehabilitation does not include IR-29 and -30, which will be replaced following rehabilitation of wells IR-31 and IR-32.

2. Attachment 1, Page 3 of 3, Procedure 2.10:

The third sentence of the procedure states “[C]hemicals need to be pumped out of the injection wells since acidic conditions will neutralize the chemicals used to disinfect the well during the second phase of well rehabilitation”. It is unclear what disinfection chemicals will be used for the injection wells and what the second phase of well

rehabilitation is. Disinfection procedures (or the second phase of well rehabilitation) for the injection wells must be added to the well rehabilitation procedures.