



**Hilcorp Alaska, LLC**

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April 8, 2024

Mr. Brett Feldhahn  
PCB Coordinator  
RCRA Corrective Action, Permits, and PCB Section  
Land, Chemical, and Redevelopment Division  
US EPA Region 10  
1200 Sixth Avenue, Suite 155, MS 15-H04  
Seattle, WA 98101-3123

Re: Notification of Construction Project Involving Soil Disturbance at Swanson River Facility, Alaska: 2024 Anode Groundbed Installation

Dear Mr. Feldhahn:

Hilcorp Alaska, LLC (Hilcorp) plans to conduct a construction project that will involve soil disturbance at the Swanson River Facility, Alaska. This letter is Hilcorp's official agency notification of the project in accordance with the requirements of the Swanson River Facility Soil Management Plan for PCBs (Soil Management Plan, or "Plan").

The project involves the installation of anode groundbeds to provide cathodic protection for pipelines at the facility. Two anodes groundbeds are planned for installation, each positioned in a vertical soil boring 150 feet deep, electrically connected to the surface and facility infrastructure with cabling. Installation of the anodes will require advancement of two, 10-inch soil borings to a depth of 150 feet. Connection of each anode to the adjacent facility will require digging of two utility trenches, approximately 1 foot wide and 2 feet deep, with anticipated lengths of 85 feet and 170 feet. The approximate location of the anodes and trenching is indicated on Figure 1. The construction site work is planned for the summer of 2024 (June through August 2024).

Hilcorp will conduct the project in accordance with applicable requirements of the facility's Soil Management Plan. Analytical results will determine reuse or disposal options for the soil. Soil characterized as containing polychlorinated biphenyl (PCBs) greater than (>) 10 milligrams per kilogram (mg/kg) will be sent offsite for disposal to a Treatment Storage and Disposal Facility (TSDF) permitted to accept the PCB remediation waste. Soil characterized as having PCBs less than or equal to ( $\leq$ ) 10mg/kg will remain onsite for reuse per the Soil Management Plan. Specific sampling and soil management activities planned for the project are summarized below, with all references to sampling referring to sampling and analysis of PCBs. Figure 2 presents a more detailed map of the anode and trench locations, along with the planned sampling locations.

## Utility Trenches

1. Surface soils will be sampled along the trench route prior to trenching to characterize PCB concentrations.
  - a. Surface samples will be collected on a 10-foot spacing utilizing the facility's established PCB soil sampling grid. Soil samples will be collected from the upper 6 inches of soil. Where the trench is located equidistant from two grid nodes, both will be collected.
2. Soil planned for removal from the trench (anticipated to be 2 feet below ground surface [bgs]) will be characterized based on these "as-found" concentrations using the surface sample results. The bottom (floor) of the completed excavation will be sampled if and where the overlying surface sample had a PCB concentration > 1 mg/kg. This bottom of the excavation sampling is for characterization purposes in support of future site management and cleanup decisions.
3. During trench digging, soil containing PCBs > 10 mg/kg will be segregated and containerized for offsite disposal in accordance with the Plan. Soil containing PCBs > 1 mg/kg, but ≤ 10 mg/kg will be stockpiled near the excavations for later reuse as backfill, in the approximate location it was removed from in the trench.

## Soil Borings (10-inch diameter, 150 ft deep)

1. Surface soil samples will be collected at the location of the two planned anode borings to characterize the surface soils (0-2 ft bgs). If PCBs > 10 mg/kg are detected, the upper two feet of soil at this location will be hand dug within the footprint of the planned boring and containerized for offsite disposal.
2. Due to the presence of numerous underground utilities and pipelines in the proximity of the planned anode installation, a vacuum truck will be used to remove soil to a depth below where utilities and pipelines are anticipated to be encountered (approximately 0 to 8 feet bgs).
  - a. The vacuum truck contents (< 0.5 cubic yards) from each boring location will be discharged onto a liner for temporary storage and sampling. One 5-part composite sample will be collected from each resulting stockpile for PCB analysis.
3. A drill rig will be used to advance the boring below 8 ft bgs. No sampling is planned for soil below 8 ft bgs unless PCBs > 10 mg/kg are detected in the 0 to 8-foot composite sample. Until those results are received, soil from the 8 to 20-foot bgs interval will be segregated from deeper soil in a separate stockpile next to each boring. If the upper (0-8 ft) soil sample does not contain PCBs > 10 mg/kg, it will be assumed that the soil below 8 feet also does not contain PCBs > 10 mg/kg and the soil will remain onsite. If PCBs are detected in the upper sample above 10

mg/kg, the 8 to 20-foot stockpile material will be composite sampled to determine the concentration of PCBs in the soil and managed in accordance with the Plan. Based on the site history and boring locations, the likelihood PCBs will be detected in 8 to 20-foot material is considered highly unlikely.

- a. Soil from the 20 to 150-foot bgs boring interval will be stockpiled for reuse as backfill onsite (within the facility). The soil from the borings cannot be placed back into the boring because the anode installation will fill the void space. Based on the site history, there is little to no potential for PCBs to present (detectable) at those depths, and no reasonable potential for PCBs to be present > 10 mg/kg, which is the criteria for onsite reuse, so sampling of this material is not considered warranted.

Following the completion of the project, a report will be prepared for submittal to the EPA and other agencies summarizing project activities and findings. The facility-wide data tables and maps of PCB soil concentrations will be updated as part of the reporting process.

If you have questions concerning this notification or require additional information, please contact me at (907) 777-8308 or by email at [marshall.farris@hilcorp.com](mailto:marshall.farris@hilcorp.com).

Respectfully,

Marshall Farris  
Contaminated Sites, P&A, Remediation & Restoration Environmental Specialist  
Hilcorp Alaska, LLC

CC:

Peter Cambell, ADEC  
Sharon Yarwasky, BLM  
Steve Miller, USFWS

Attachments:

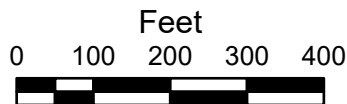
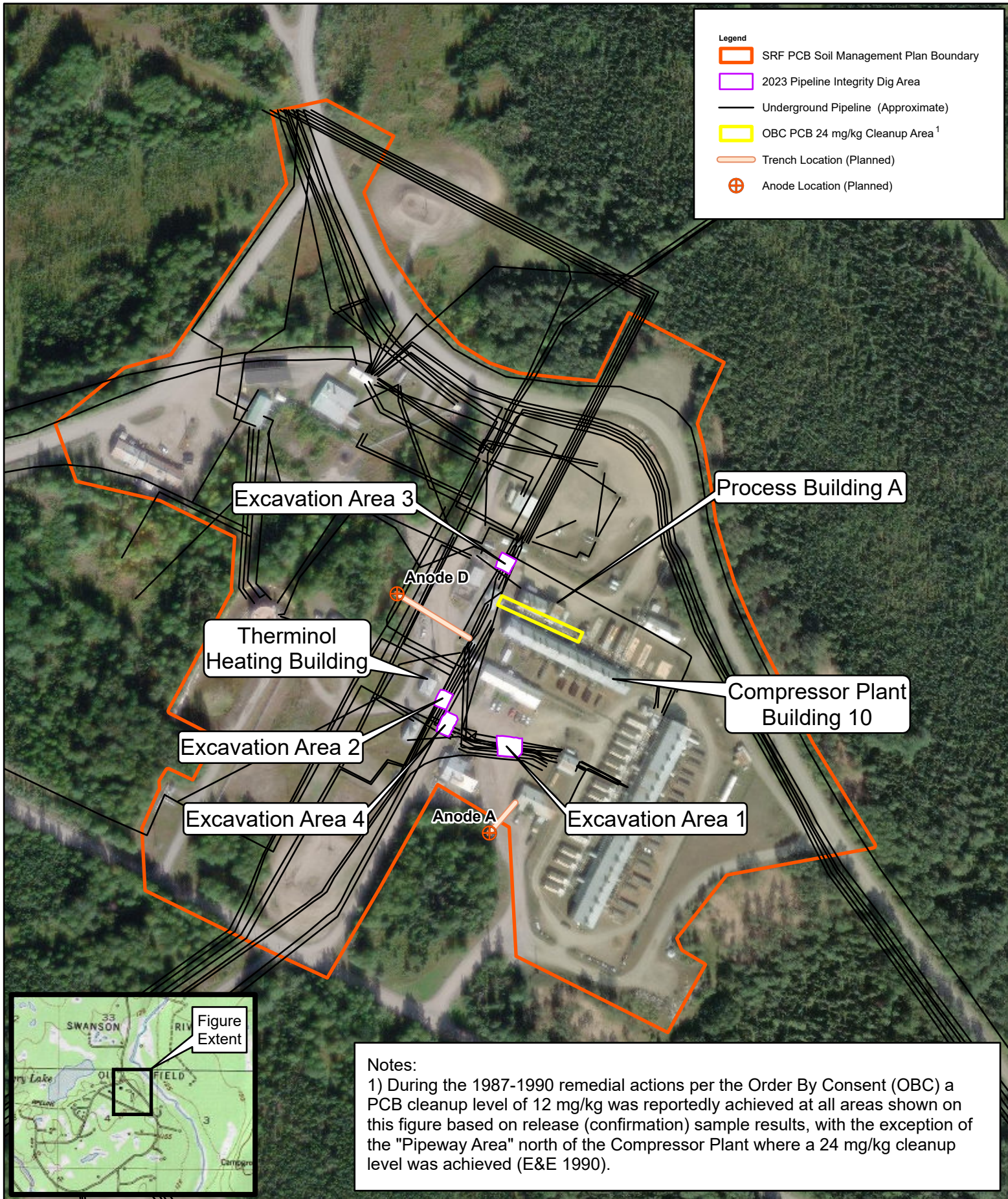
Figure 1: Site Map with Planned Anode Installation Locations and 2023 Pipeline Integrity Dig Excavations.

Figure 2: Planned Anode Installation Detail, with Planned Soil Sampling Locations.

Reference

SLR International Corporation (SLR). 2023. Swanson River Facility Soil Management Plan for PCBs. Prepared for Hilcorp Alaska, LLC. November 2023.

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**2024 Anode Groundbed Installation Project  
Swanson River Facility  
Figure 1  
Site Map with Planned Anode Installation Locations and  
2023 Pipeline Integrity Dig Excavations**



**2024 Anode Groundbed Installation Project  
Swanson River Facility**

**Figure 2**

**Planned Anode Installation Detail, with  
Planned Soil Sampling Locations**

