



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

**Department of  
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated Sites Program

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**File: 2337.38.007**

September 16, 2019

Kegan Boyer  
Chevron Environmental Management Company  
1400 Smith Street, Room 07080  
Houston TX 77002

Re: Trading Bay Facility  
Hazard ID: 1263  
2019 Additional Beach Assessment and Permeable Reactive Barrier Pilot Study Work Plan  
ADEC Work Plan Comments.

Dear Mr. Boyer;

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), has reviewed the August 27, 2019 Additional Beach Assessment and Permeable Reactive Barrier Pilot Study Work Plan. Thank you for providing this work plan which was received in our office on August 28, 2019. ADEC has the following comments and conditions.

Beach seep samples have proved to be ineffective at identifying actual beach contamination. ADEC believes that beach seep sampling as required by the COBC is ineffective. ADEC requests that Chevron develop a compliance monitoring program that is designed to effectively characterize offshore contamination that is known to exist.

The further away from the beach the more likely that the silt confining layer may be breached, either by drilling activities, erosion or natural conditions. It is necessary to collect representative samples both above (pore water samples) and below the silt to determine the extent of offshore contaminants. This applies to both baseline and monitoring samples as breaches in the silt may allow contaminants to migrate upward. The pore water sampling should be continued into the future until it is demonstrated that there are no unacceptable impacts.

The gap between zones may be too large to determine the effectiveness of the proposed treatment system. Additional samples should be collected to both delineate the extent of the plume and determine the effectiveness of the proposed treatment. ADEC requests additional delineation samples be collected on the Figure 1.

Another area of concern is around the detection on Z1-6. Additional offshore samples should be collected to determine if beach impacts are occurring here. These samples should include both under silt samples and pore water samples. ADEC has presented two proposed sample locations on Figure 1, samples A-1 and A-2.

The extent of offshore contamination at the Trading Bay site remains undefined. The proposed remediation approach using a permeable reactive barrier passively addresses only known NAPL contamination and not the dissolved phase plume that extends outward from shore. If the extent of the offshore dissolved plume is not identified during the course of this phase of the investigation, ADEC requests that Chevron develop a plan that fully characterizes the extent of contamination, both above and below the silt layer, and a remediation plan that addresses the extent of the dissolved phase benzene plume.

I am more concerned with finding the length of the plume, than the north south clean boundary at this time. I would prefer to prioritize sample locations Z4-10, Z5-1 and Z5-6 over locations A-4, A-6 and A-7 if possible, (Figure 1).

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

Sincerely,



Peter Campbell  
Environmental Program Specialist

Cc: Craig Wilson, Stantec

