



THE STATE
of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

43335 Kalifornsky Beach Road, Suite 11
Soldotna, Alaska 99669
Main: 907-262-5210
Fax: 907-262-2294
www.dec.alaska.gov

File: 2337.38.007

June 24, 2020

Jason Michelson
Chevron Environmental Management Company
1500 Louisiana Street, Office 38116
Houston, Texas 77002

Re: Trading Bay Facility
Hazard ID: 1263
2020 Facility Groundwater Monitoring and Site Investigation Work Plan
ADEC Comments.

Dear Mr. Michelson;

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), has reviewed the Trading Bay Production Facility 2020 Facility Groundwater Monitoring and Site Investigation Work Plan dated June 5, 2020. Thank you for providing this work plan which was received in our office on June 9, 2020. The work plan is approved. ADEC has the following comments and questions.

Figure 3 presents boring locations that are intended to monitor the performance of the permeable reactive barrier (PRB). ADEC would recommend that additional sample points be added west of the PRB to monitor conditions upgradient of the barrier.

I'm concerned that NAPL in the beach prism is apparently not overlain by a confining silt layer, leaving the area vulnerable to erosion by any given storm, potentially exposing the hydrocarbons. We request that Chevron evaluate remediation plans to address beach impacts and eliminate this liability.

Now that the beach and offshore impacts appear to be delineated, we request that Chevron evaluate remediation alternatives that address this area. We encourage Chevron to include active remediation in their evaluation, including, but not limited to excavation and horizontal directional drilling.

The 2019 Annual Trading Bay Report recommended installing product recovery skimmers in the bluff top recovery wells. There was no mention of skimmers in this work plan. ADEC would like to encourage free product removal from the bluff top where practical in an effort to limit product and dissolved phase migration to the bluff and beach. We would also encourage manual removal of product

and recovery tracking if practical. Would skimmers be installed at the expense of pumps in the recovery wells? Would the loss of recovery well pumps increase the dissolved phase load to the beach?

ADEC would like to see an evaluation of remediation alternatives and a 2021 work plan. 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

Sincerely,

A handwritten signature in dark ink, appearing to read "Peter Campbell".

Peter Campbell
Environmental Program Specialist

Cc: Craig Wilson, Stantec