

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE Contaminated Sites Program

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> > File: 2337.38.007

July 8, 2020

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

Re: Trading Bay Facility

Hazard ID: 1263 2019 Annual Report ADEC Comments.

Dear Mr. Michelson;

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), has reviewed the Trading Bay Production Facility 2019 Annual Report dated March 25, 2020. Thank you for providing this report which was received in our office on April 7, 2020. The report is approved. ADEC has the following comments and questions.

In section 4.3.5, Pore water samples were not collected due to salt water intrusion. Why was salt water intrusion a factor? Were the samples not collected due to potential dilution? Would the results be relevant anyway as an exposure factor or actual measurement of impacts to the environment? The conductivity of pore water samples that were collected were close to the measured sea water conductivity.

Figure 6 represents NAPL on the beach, but perhaps a better representation of the data would included the bluff top NAPL. Representating the sources as connected might give a better perspective of the load on the permeable reactive barrier. Would angled bluff top borings that intercept the NAPL layer within the bluff be of any value?

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,

Poto Carolina

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July 8, 2020

Peter Campbell Environmental Program Specialist

Cc: Craig Wilson, Stantec