



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

Department of Environmental
Conservation

DIVISION OF SPILL PREVENTION &
RESPONSE
Contaminated Sites Program

43335 Kalifornsky Beach Road, Suite 11
Soldotna, Alaska 99669
Main: 907.262.5210
Fax: 907.262.2294

File: 2323.38.055

July 17, 2014

Chris Clodfelter
Baker Hughes Oilfield Operations, Inc.
2929 Allen Parkway, Suite 2100
Houston, TX 77019

Re: Baker Oil Tools - Delores Drive
ADEC Hazard ID: 25935
Site Characterization Report July 9, 2014 Comments

Dear Mr. Clodfelter:

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), would like to thank you for submitting your Site Characterization Report for the Baker Oil Tools site, located in Nikiski, Alaska. We want to acknowledge the receipt of the July 9, 2014 Nikiski Completions Facility Site Characterization Report, Nikiski, Alaska, prepared by Ahtna Engineering. Our office received this report on July 9, 2014.

In a discussion with Dan Frank, the Ahtna project manager, at the time the report was delivered, we granted permission to re-sample the new monitoring wells under the existing workplan. These conditions are extended to the installation of the three new monitoring wells proposed in this report.


The following comments are directed at specific items in the Site Characterization Report:

- 1) The Ahtna assumption that TCE concentrations detected in the shallow soils are the result of vapor condensing in shallower soil is difficult to substantiate.
- 2) ADEC does not understand how the unsubstantiated claim that PCE was used at the Nikiski Fire Station is relevant to this investigation. PCE is not a contaminant of concern at this site. ADEC has previously investigated claims that PCE was used at the Nikiski Fire Station and neither the Kenai Peninsula Borough nor ADEC found evidence to support this allegation.

- 3) We are recommending that Baker Oil Tools use the full list of analytes for the EPA 8260 test for the next round of groundwater sampling, at least in the most contaminated monitoring well. It is possible that additional solvents might be present, and we believe that it would be important to identify any additional compounds of concern now, rather than later in the investigation.
- 4) Floor drains and associated sumps are regulated by the Environmental Protection Agency, (EPA) as underground injection wells. Federal law requires that these underground injection wells be reported to EPA. Ms. Jennifer Parker is the appropriate EPA contact at this time. We have provided Ms. Parker's contact information for your convenience below.
- 5) The conclusions and recommendations section (7.1) indicates that the leach field is an unlikely source of TCE. We feel it is premature to eliminate the leach field as a source area for the following reasons: a) TCE was reportedly detected in a sump using a Color-Tec field screening method, b) the discharge from the sumps remain unknown, c) the full extent of the leach field has not been identified, let alone assessed, and d) contaminants detected in MW-1 could be from the leach field, especially the shallow detections at 15 feet below ground surface.
- 6) ADEC lacks confidence in the groundwater contours presented on Figure 5. The two Nikishka Bay Utilities water supply wells both house pumps that withdraw groundwater at approximately 250 gallon per minute when running. A prior water table survey in the late 1980s, which included more groundwater elevation data points than the Ahtna survey, identified slight water table depression associated with the two high capacity public water supply wells. We recommend that Ahtna consider expanding the groundwater table elevation data by including one of the Nikishka Bay Utilities production wells, as well as the Dee Rappe drinking water well. The Dee Rappe well is not in use and would provide a low cost elevation data point, compared to the cost associated with installing an additional groundwater monitoring well.
- 7) It has come to our attention that several of the residence's south-east of Baker Oil Tools are using private water wells for their domestic water supply. We want to inform you that ADEC will be contacting these residences and providing a copy of the Site Characterization Report for their information and use. Dee Rappe will also receive a copy of this report. ADEC may request that Baker Oil Tools collect a water sample from these private water systems to determine if there have been any impacts. We are providing you a water system distribution map for your information.

If you have questions about this letter, or any other aspect of this project, feel free to contact me at (907) 262-3412, or via e-mail at peter.campbell@alaska.gov

Sincerely,



Peter Campbell
Environmental Program Specialist

Attachments: Nikiska Bay Utilities, Inc. Existing System Analysis 2009 Map

Cc: Jason Goodwin, P.G., Baker Hughes Oilfield Operations, Inc.
Dan Frank, Ahtna Engineering Services, LLC

Jennifer Parker
US Environmental Protection Agency, Region 10
Groundwater Unit
1200 Sixth Ave, Suite 900, OCE-082
Seattle WA 98101
(206) 553-1900