



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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

File: 2337.38.007

March 15 2021

Kelley Nixon
Hilcorp Alaska, LLC.
3800 Centerpoint Drive, Suite 1400
Anchorage AK 99503

Re: Trading Bay Facility
Hazard ID: 1263
Requirement for PFAS Release Assessment

Dear Ms. Nixon;

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), has reviewed the Trading Bay Production Facility Former Fire Training Area Per- and Polyfluoroalkyl Substances Sampling Report, Jacobs Engineering (January 2021). Thank you for submitting the report to our office.

Based on the information provided in the report, it is our understanding that regulated firefighting foams have been released to the environment. ADEC is requiring Hilcorp to develop a release assessment site characterization work plan to sample for per- and polyfluoroalkyl substance (PFAS) compounds in the soil, groundwater and surface water of the Trading Bay site.


ADEC regulation 18 AAC 75.335 requires that the extent of hazardous substance contamination be fully characterized, and that a site characterization work plan be submitted to ADEC for review and approval prior to beginning the site characterization work. We are requiring that Hilcorp provide our office with a site characterization work plan under the regulatory authority of 18 AAC 75.335 (Site Characterization). Your work plan must be approved by ADEC, prior to implementation.

The work plan should address the extent of soil contamination, assessment of impacts to aquifer, impacts to surface water and an assessment of site drinking water, water supply, fire water and remediation pumping wells. ADEC does not consider depth of water wells to be an exclusive factor that protects a deep well from impacts as the wells are old and have been subjected to numerous earthquakes potentially effecting grout integrity.

The work plan should address the fire training area and the facility as a whole, where fire suppression infrastructure may have discharged foams to the environment through leaks, testing or firefighting.

The work plan must be prepared and signed by a qualified environmental professional, and provided to our office no later than June 1, 2021. 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". The signature is fluid and cursive, with the first name "Peter" and last name "Campbell" clearly distinguishable.

Peter Campbell
Environmental Program Specialist