



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

May 19, 2021

Shelby Lathrop
Chevron Environmental Management Company
6001 Bollinger Canyon Road, C2092,
San Ramon, CA 94583

Re: Trading Bay Facility
Hazard ID: 1263
2021 Groundwater Monitoring and Site Investigation Work Plan Approval
and Work Plan Request.

Dear Ms. Lathrop;

The Alaska Department of Environmental Conservation Contaminated Sites Program (ADEC), has reviewed the Trading Bay Production Facility 2021 Groundwater Monitoring and Site Investigation Work Plan dated April 27, 2021. Thank you for providing this work plan which was received in our office on April 27, 2021. The work plan is approved with the following comment.

Page 6 of 25, last paragraph reads "The benzene data shows a significant decrease in concentrations between the bluff top wells and the beach seeps." This is a misleading statement, in that the beach seeps do not represent the discharge from the bluff. The impacts from migration of contamination emanating from the bluff to the beach are best measured in the groundwater wells and subsurface water on the beach where separate phase product and elevated benzene occurs at concentrations equal to those found at the bluff top. (See figures 5 & 6 in the 2020 Annual Report.)

ADEC is requesting an additional work plan, or addendum to this approved work plan, to address the following two items:

1. ADEC is requiring that Chevron collect a water sample from the outfall of the remediation system pumping wells and test that sample for PFAS compounds, including PFOS and PFOA. The discovery of these compounds in groundwater on the site makes it prudent to do so as this water discharges to Cook Inlet.
2. It is time to address beach impacts. Please present a work plan for this field season to address separate and dissolved phase product remediation on the seaward side of the permeable reactive barrier beach remediation system.

Please prepare a work plan that addresses PFAS sampling and beach remediation, submitted to ADEC by **July 12, 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 black ink, appearing to read "Peter Campbell".

Peter Campbell
Environmental Program Specialist

Cc: Craig Wilson, Stantec