



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Environmental  
Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE  
Contaminated sites Program

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File No. 2334.38.017

November 10, 2016

Ashley Livings  
Chevron Environmental Management Company  
1400 South Smith Street RM 07072  
Houston, TX 77002

Re: Swanson River P&S Yard  
2015 Remediation Report  
ADEC Review Comments

Dear Ms. Livings:

On September 21, 2016, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the 2015 Remediation Report for the Swanson River Field P & S Yard site. This document was prepared by AECOM. Thank you for providing this report to our office.

After reviewing the data presented in the report, we commend Chevron for completing the targeted soil excavation and remediation within the primary slurry wall containment area. In response to your request for a no further action determination for soil at the P&S Yard, we believe that decision is premature at this time. Before considering closure, we would like to complete soil remediation activities at the western end of the site and receive some groundwater quality data from the new monitoring wells.

For years, the remediation efforts have focused on the treatment of soils within the primary slurry wall containment area. We viewed those remediation efforts to be the primary effort to reduce the concentration of xylene in the wetland and creek immediately east of the containment area. Now that the planned soil remediation work within the containment area has been completed, the residual contamination in the wetland, and its impact on the surface water, become ADECs primary concern.

The State of Alaska Water Quality Standards (18 AAC 70) apply to surface waters. The applicable standards are 10 ug/L total aromatic hydrocarbons (TAH) and 15 ug/L total aqueous hydrocarbons

(TAqH). Surface water samples collected from the creek document continuing and substantial exceedance of the 10 ug/L TAH standard during summer/fall months. ADEC has developed guidance for implementation at sites where contaminated groundwater merges with surface water. We are attaching this guidance, Technical Memorandum 01-005, Regulatory Approach to Managing Contamination in Hydrologically Connected Groundwater and Surface Water, April 13, 2011, for your information, understanding, and use. Under this memorandum, ADEC may deem monitoring well WP-1 as the regulatory point of compliance for meeting the water quality standards.

In future reports and work plans, the TAH and TAqH water quality standards should be referenced as cleanup standards for all creek (surface water) sample locations, rather than the groundwater cleanup levels established in the compliance order by consent (COBC).

Summarizing, in addition to meeting the applicable soil and groundwater cleanup levels established in the P&S Yard COBC, surface water quality in the creek must meet the applicable 10 ug/L and 15 ug/L water quality standards before ADEC could issue a cleanup complete decision for this site.

Chevron should proceed with development of a work plan to both monitor, and ultimately restore, surface water quality in the creek. The work plan must include a more rigorous sampling of the surface water by establishing additional sampling locations in the creek. TAqH sampling should be included for the down gradient wetland monitoring wells and creek samples, at least on an interim basis, in order to determine if TAqH is present at concentrations exceeding 15 ug/L.

We would like you to be aware that ADEC cleanup levels for hazardous substances in soil and groundwater have been updated under revisions that have been made to 18 AAC 75, Oil and Hazardous Substances Pollution Control regulations. The revised regulations and cleanup levels became effective effect November 6, 2016. The new cleanup levels for xylene have been substantially reduced, and are similar to the cleanup levels that were established in the Compliance Order by Consent (COBC). ADEC's revised soil and groundwater cleanup levels can be found by clicking on the tab labeled "Final Filed Regulations Effective November 6, 2016" at this web address: [http://dec.alaska.gov/spar/regulation\\_projects/cs18AAC75.htm](http://dec.alaska.gov/spar/regulation_projects/cs18AAC75.htm)

Due to ADEC office constraints limiting available space for storing hard copies of project files, we request that future reports and work plans be submitted to our office electronically, instead of hard copy. If documents are too large to submit by e-mail, please transfer by disk or using Alaska Zendto file transfer web site.

If you have any questions on any aspect of this project, please contact me at (907) 262-3412, or by e-mail at [peter.campbell@alaska.gov](mailto:peter.campbell@alaska.gov).

Sincerely,



Peter Campbell  
Environmental Program Specialist

Attachment: Technical Memorandum 01-005, Regulatory Approach to Managing Contamination  
in Hydrologically Connected Groundwater and Surface Water, April 13, 2011

C: Allen Bennet, AECOM (*electronic copy*)  
Lynnda Kahn, USFWS (*electronic copy*)  
Sharon L. Yarawsky, BLM (*electronic copy*)

