



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Site Program

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August 11, 2021

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

Re: Swanson River P&S Yard
2020 Annual Report
ADEC Report Review and Comments

Dear Ms. Lathrop:

On June 4, 2021, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the 2020 Annual Report for the Swanson River Field P & S Yard site. This document was prepared by Stantec. Thank you for providing this document to our office. ADEC has the following comments.

ADEC is not opposed to removal of the piezometers.

It appears that all samples in the wetland borings (BH-1 – BH-29) were collected in the peat or at the peat mineral soil interface, with no field screening or samples collected in the lower mineral soils. I am concerned that proceeding without analytical results from deeper mineral soils could be problematic. The 2021 work plan calls for collecting the deepest samples at the peat silt interface. Please collect additional representative samples from the saturated zone within the mineral soils, especially in the area of highest observed contamination in shallower soils.

Wetland piezometers were sampled in 2020 and the data was presented, but no map was provided showing piezometer locations. Please provide a figure for the report showing the locations so that the report may stand alone.

Wetland boreholes were abandoned and backfilled with pea gravel. ADEC's Monitoring Well Guidance (September 2013) calls for sealing wells and boreholes with grout, only using gravel near the ground surface. Future borehole abandonment should be completed with grout or chips unless otherwise approved in a work plan by an ADEC project manager.

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.

Sincerely,



Peter Campbell
Environmental Program Specialist

- C: Craig Wilson, Stantec (*electronic copy*)
Lynnda Kahn, USFWS (*electronic copy*)
Sharon L. Yarawsky, BLM (*electronic copy*)
Stephanie Rice, BLM (*electronic copy*)