

**From:** [Evans, Mike R \(DEC\)](#)  
**To:** [Kelley Nixon](#)  
**Cc:** [Gamble, Jade D \(DEC\)](#); [Eric Braun](#); [Edward Castillo](#); [Stephen Morgan](#); [Paul Delago](#); [Dan Marlowe](#); [David McGrady](#); [Mark Tornai](#); [Gamble, Jade D \(DEC\)](#); [Campbell, Peter C \(DEC\)](#)  
**Subject:** RE: TBPf Dig 15 Release Update - 08192021  
**Date:** Monday, August 23, 2021 9:39:35 AM  
**Attachments:** [image001.png](#)

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Kelley,

18 AAC 75.310(c)(2) gives the department the authority to determine at what point the source of the contamination has been abated and that cleanup should proceed under the “site cleanup rules”, 18 AAC 75.325 – 18 AAC 75.396. At this time, the department has determined that no further excavation is warranted once the practical extents of excavation of contaminated soil have been reached due to the potential for adverse impacts to existing infrastructure. IAW 18 AAC 75.325(b) the site cleanup rules apply to a sudden or recent discharge or release of a hazardous substance, if the department determines under 18 AAC 75.310 that application of the site cleanup rules is necessary. Both the Prevention, Preparedness and Response (PPR) and Contaminated Sites (CS) programs have authority to proceed under the site cleanup rules, though typically the CS program handles longer term cleanup issues. Because contamination will be left in place, this site will be transferred to CS. Prior to that, the department requires Hilcorp to conduct an initial site characterization per the requirements of 18 AAC 75.335 to determine the horizontal and vertical limits, and soil and/or groundwater concentrations of contaminants. Please provide a site characterization work plan for accomplishing this.

Additionally, the photo you provided (TBPf Dig 15 Release\_08122021.pdf) indicates that two leaking flange gaskets, on what appears to be a spool piece on a section of piping, were replaced. The photo shows four other flanges that are presumed to have similar gaskets.

1. Has Hilcorp inspected those gaskets to determine suitability for continued service?
2. Has there been consideration for replacing those gaskets as preventative maintenance?

Please respond at your earliest convenience and feel free to contact me with any questions.



**Mike Evans**

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**From:** Kelley Nixon <[knixon@hilcorp.com](mailto:knixon@hilcorp.com)>  
**Sent:** Thursday, August 19, 2021 6:16 PM  
**To:** Evans, Mike R (DEC) <[mike.evans@alaska.gov](mailto:mike.evans@alaska.gov)>

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**Subject:** RE: TBPf Dig 15 Release Update - 08192021

Hello Mike –

Earlier this afternoon, I had a Teams call with the acting Lead Op and the QEP providing response support. Attached is a photo of the excavation that the QEP took and scanned and to which I added feature labels and a North arrow. I've also attached a second photo that was taken from the opposite direction.

As you can see in the photos, we are reaching the practicable extents of the excavation due to existing infrastructure. The main part of the excavation, upon reaching the practicable extents, will measure approximately 12 feet by 21 feet by 11 feet deep; however, substantial benching has been needed for safe access. The surface excavation extents are therefore significantly larger. The volume of the release has been revised to 55 gallons.

The field expects to be able to reach the practicable extents tomorrow and then remove via super sucker the loose soil in the excavation. The estimated final volumes of excavated material are 56 cy of impacted soil and 147 cy of unimpacted soil. The latter is stockpiled separately from the impacted soil. The contaminated soil is visibly observable and volatiles are evident by smell and LEL. Air monitoring has been occurring to ensure worker safety. No clean boundaries have been identified yet; however, screenings indicate clean soil from 0-9 feet bgs on the east side of the excavation. Although there is variation in the excavation, contamination has been encountered as shallow as 4 feet below ground surface. The bulk, however, appears to have settled in a layer of denser material that starts around 9 feet below ground surface. Contamination in the excavation from 9-11 feet below ground surface is screening in the 600-ppm range.

As you know, our Inspections crew is out there now and is collecting data on the lines. Next week, the data evaluation will begin. Following that, a plan will be developed and implemented before winter sets in to address any integrity or other relevant issues that have or may be identified. The excavation will remain open until the data is evaluated and the corrective actions identified and implemented. Small earthen berms will be constructed at the periphery of the excavation to prevent runoff from entering the excavation while it remains open. Please let us know if ADEC sees any issue with this approach and schedule.

Also, please let us know if ADEC will allow us to discontinue response activities, specifically excavation, once we reach the practicable extents (12'x21'x11'deep) discussed previously. If so, Hilcorp will arrange for the QEP to conduct soil screening and confirmation sampling of the excavation, which will be provided in the QEP's report to ADEC.

Thank you,  
Kelley

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**Subject:** TBPF Dig 15 Release Update for 8/9/2021

Hi Mike,

Here is the update on the Dig #15 Release you requested in our phone conversation this morning.

On Thursday, August 5, 2021, while conducting excavation activities to inspect buried facility oil piping, crews observed wet spots on the piping insulation at Inspection Dig #15. The insulation was removed, revealing a seeping flange. The gasket on the flange had failed. The gasket was replaced. An estimated release volume was determined to be 5 gallons of slop oil. The oil was headed to the Sand Drain from Battery 2 via gravity-fed steel piping. On 8/9/2021, additional digging along the line uncovered another flange on the line about 2 feet from the repaired gasket. This flange also had a failed gasket and it was replaced that same day.

Jacobs Engineering is providing onsite QEP support as of Monday, August 9<sup>th</sup>. The QEP is helping direct excavation activities based on observations and PID soil screenings. As of yesterday evening, approximately 18 cubic yards of impacted material had been removed and containerized.

The attachments show where the dig occurred, the line that is the source of the leak, and photographs showing the leak before repair, the first gasket that was removed, the excavation, and exposed piping within the excavation.

I will provide another update tomorrow.  
Thank you and enjoy the (finally) sunny evening.  
Kelley

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