



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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File No. 2337.38.007

October 8, 2021

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

Re: Trading Bay Production Facility Former Fire Training Area Per- and Polyfluoroalkyl
Substances Sampling Work Plan
ADEC Work Plan Approval

Ms. Nixon:

On September 22, 2021, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the Trading Bay Production Facility Former Fire Training Area Per- and Polyfluoroalkyl Substances Sampling Work Plan. This document was prepared by Jacobs Technology, Inc. The work plan is approved.

Please evaluate the safety of collecting a soil sample from within the flare pit, and if reasonable to do so, collect at least one surface soil sample from the upper six inches of soil. The sample does not have to be collected from the base of the flare.

At Tank 13, collect two surface soil samples from the berm, and one surface soil sample from where stormwater has been discharged from the containment.

It is likely that water samples collected from the proposed monitoring well at Tank 13 will have separate phase hydrocarbons present. Please be prepared for this scenario and confirm with the laboratory that they will be able to analyze these samples.

Please collect a minimum of three representative site characterization surficial soil samples from within the central facility to determine soil conditions.

If a groundwater plume is identified, please plan on maintaining an interior monitoring well to monitor the long-term concentrations.

When drilling monitoring wells, please collect surface soil samples, in addition to soil samples at depth that are representative of the soil column.

The appropriate screening level for PFBS in groundwater is 0.601 ug/L or 600 ng/L. It appears you used a Hazard quotient of 1.0 for the calculation. A Hazard quotient of 0.1 should be used for the screening level calculation. You should be aware of the MTG value for PFBS if the pathway is complete to groundwater and what values are used for delineation.

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

Sincerely,



Peter Campbell
Environmental Program Specialist

Electronic copies via e-mail:

Andrew Tarnas-Raskin – Jacobs Technology Inc.