



Tesoro Alaska Company LLC

Kenai Refinery
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August 21, 2023

Ms. Janice E. Palumbo
Environmental Compliance Specialist
Office of Solid Waste and Emergency Response
RCRA Permitting Unit
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Submitted via email
Palumbo.jan@epa.gov

**RE: EPA - TECHNICAL REVIEW COMMENTS Quarterly Progress Reports No. 23-2
Tesoro Alaska Company LLC
Kenai Refinery
EPA ID# AKD 048679682**

Dear Ms. Palumbo:

Tesoro Alaska Company LLC (d/b/a Marathon) is providing this response to comments received via email on August 17, 2023 on the Quarterly Progress Report No. 23-2. Enclosed is a response to comments table addressing the Technical Review Comments.

Upon EPA approval, Tesoro will proceed with corrections and upcoming activities outlined in Enclosure 1 – Response to Comments Table. If you have questions or concerns, please contact me at (907) 776-2090 or splate@marathonpetroleum.com.

Sincerely,

Stephanie Plate
Adv. Environmental Engineer
Tesoro Alaska Company

Enclosure- Response to Comments Table

CC via email: Rory O'Rourke, orourke.rory@epa.gov, EPA Region 10
Peter Campbell, peter.campbell@alaska.gov, ADEC Soldotna Office
Tong Li, tongligws@comcast.net, ASE

RESPONSE TO TECHNICAL REVIEW COMMENTS

Quarterly Progress Report No. 23-2
Tesoro Alaska Company, LLC. Kenai, Alaska
21-Aug-23

EPA General Comments	Response
1. The new monitoring well south of E-072RR must be installed before the winter 2023 sampling event.	The new monitoring well, E-259, south of E-072RR is scheduled to be installed September 5th through 12th, 2023. E-259 will be added to the Q24-1 (November, December, January) sampling list. In accordance with Permit Condition IV.C.2a, E-259 will remain on the quarterly sampling list for a minimum of eight (8) consecutive quarters.
2. Injection well replacement and rehabilitation tasks must be discussed in the upcoming activities sections.	Noted. Following injection well replacement and rehabilitation efforts scheduled for early September 2023, field activities will be discussed in the Q23-4 Report. Marathon is currently awaiting ADEC approval of the 2023 Injection Well Rehabilitation Work Plan. Rehabilitation efforts could be delayed depending on approval; however, once performed, all rehabilitation activities will be discussed in the following quarterly report.
3. R-21R recovery well piping reconfiguration must be completed as soon as possible. If feasible, R-21R should be brought online before 2024.	Noted. R-21R recovery well piping reconfiguration has been in the refinery management of change (MOC) process. Installation will begin as soon as feasible after MOC is complete, and will be scheduled for the fall of 2023 or spring of 2024.
4. Localized benzene plume around E-160 and E-171 must be closely monitored. EPA recommends a few additional monitoring wells be sampled in the next few quarters in addition to the two proposed downgradient monitoring wells.	Marathon agrees with EPA and the additional wells listed in Specific Comments 2 and 3, have been added to Q23-4 sampling. These monitoring wells will remain on a quarterly sampling basis until the localized benzene plume has been adequately assessed.
5. Additional pumping operation data must be collected for the industry water supply wells Unocal-5/6 to further evaluate benzene detections and concentration variations in well E-147 of the Upper Confined Aquifer (UCA).	Pumping operations to Unocal 5, (Lower Confined Aquifer well), and Unocal 6 (Upper Confined Aquifer well) have been shutdown for more than 15 years. Due to inactivity, there is no current pumping operation data available.
SPECIFIC COMMENTS	
1. QPR 23-2, Page 3-4, Section 3.4.2: It is not clear why R-21R piping reconfiguration cannot be completed before 2024. Continuous R-21R shutdown would allow more benzene flux to migrate downgradient and increase the contaminant loading to the downgradient air-sparge treatment and recovery wells R40/41 and R-56 in the PRM area. EPA strongly recommends that R-21R be brought online before the beginning of 2024.	As noted above, Marathon will take action in an attempt to reconfigure R-21R recovery well piping and bring R-21R online before the end of 2023. After the MOC is complete, contractor availability will drive scheduling, which could result in activities being pushed to Spring of 2024. However, Marathon will make every effort to complete work and have R21-R online before 2024.
2. QPR 23-2, Page 4-2, Section 4.3, last paragraph and continued on page 4-3: The detection of benzene concentrations exceeding the benzene cleanup criterion at E-160 and E-171 appears to indicate a localized benzene plume around the two wells in the area. This "orphan" benzene plume must be closely monitored during next few quarters sampling events. Well pair E-137A/B, to the north (cross-gradient) of well E160, must also be sampled in Q23-3.	Marathon agrees with EPA. Since Q23-3 has already lapsed, monitoring wells E-160, E-171, E-155, E-156, E-137A, and E-137B have been added to a quarterly sampling rotation starting Q23-4. These monitoring wells will remain on a quarterly sampling basis until the localized benzene plume has been adequately assessed.
3. QPR 3-2, Page 4-5, Section 4.7: For upcoming activities for B-aquifer, E-171 and E-137A/B must also be sampled in Q23-3 in addition to wells E-160, E-155, and E-156 to evaluate the "orphan" benzene plume area around E-160 and E-171.	As stated in Specific Comment 2, monitoring wells E-160, E-171, E-155, E-156, E-137A, and E-137B have been added to a quarterly sampling rotation starting Q23-4. These monitoring wells will remain on a quarterly sampling basis until the localized benzene plume has been adequately assessed.

RESPONSE TO TECHNICAL REVIEW COMMENTS

Quarterly Progress Report No. 23-2

Tesoro Alaska Company, LLC. Kenai, Alaska

21-Aug-23

EPA General Comments	Response
<p data-bbox="134 293 462 321">4. QPR 23-2, Page 5-1, Section 5.3:</p> <p data-bbox="134 321 1031 514">EPA agrees that well E-147 should be monitored on a quarterly basis to evaluate the change in benzene concentrations and determine if further action is required for the UCA. Well E-147 is located in the vicinity of industrial water supply wells Unocal-5/6; pumping drawdown from Unocal 5/6 may increase groundwater leakage from the overlying unconfined aquifer. The pumping operational data (pumping rates and operation on/off schedule) for Unocal-5/6 must be collected during the current quarter to evaluate the potential relationship between the benzene concentration variations in E-147 and the water supply well pumping.</p>	<p data-bbox="1031 321 1961 397">Pumping operations to Unocal 5, (Lower Confined Aquifer well), and Unocal 6 (Upper Confined Aquifer well) have been shutdown for more than 15 years, indicating active pumping is not a potential cause in E-147 concentration increases.</p>