



File No. 2323.38.014

April 1, 2022

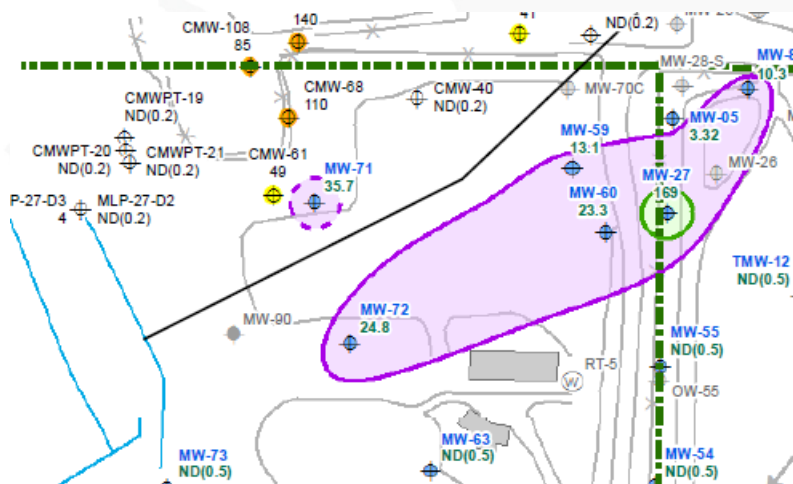
Stephanie Plate
Kenai Pipeline Company
P.O. Box 3369
Kenai AK 99611

Re: Kenai Pipeline Company 2021 Groundwater Monitoring Report
ADEC Report Approval

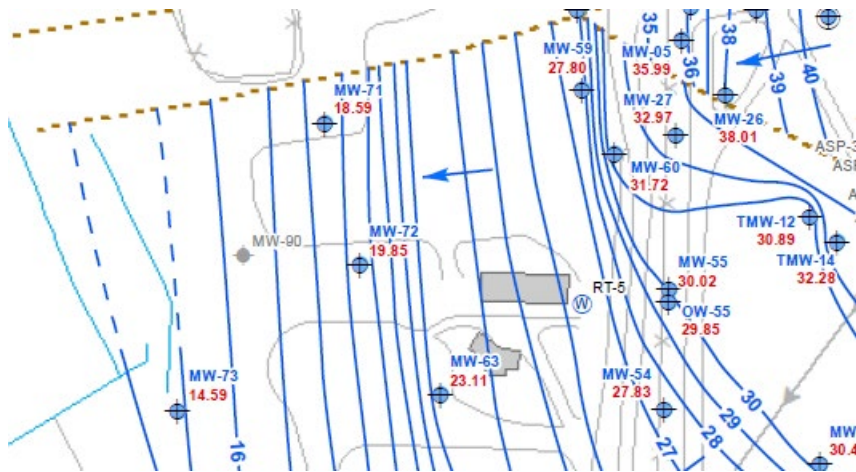
Ms. Plate:

On March 16, 2022, the Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), received the 2020 Groundwater Monitoring Report, dated March 14, 2022. This document was prepared by Trihydro Corporation. The report is approved.

This image is from the 2019 KPL Groundwater Monitoring Report Figure 6 Benzene Plume.



This image is from the 2019 KPL Groundwater Monitoring Report Figure 4 Unconfined Aquifer Potentiometric Surface Map July 2019.



My concern is that the benzene depicted at MW-71 does not stand alone, but is connected to the larger Pipeline Manifold plume emanating from MW-59 and MW-72. This plume could then move down gradient between existing monitoring wells to the beach, particularly between MW-71 and MW-90. This is an area near the public beach access where hydrocarbon impacted soils are present at the ground surface. I suspect that impacted soils were deposited there (inappropriately) by Chevrons contractor as fill.

CMW-115 was installed and was first sampled in 2020 (ND). It appears to alleviate concerns that hydrocarbon could be moving undetected to the beach area.

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

Peter Campbell
Environmental Program Specialist

Electronic copies via e-mail: Brianna Force, Trihydro Corporation