



Hilcorp Alaska, LLC

Post Office Box 244027
Anchorage, AK 99524-4027

3800 Centerpoint Drive
Suite 1400
Anchorage, AK 99503

Phone: 907/777-8300
Fax: 907/777-8301

May 7, 2024

Mr. Brett Feldhahn
PCB Coordinator
RCRA Corrective Action, Permits, and PCB Section
Land, Chemical, and Redevelopment Division
US EPA Region 10
1200 Sixth Avenue, Suite 155, MS 15-H04
Seattle, WA 98101-3123

Re: Notification of Construction Project Involving Soil Disturbance at Swanson River Facility, Alaska: 2024 Piling Installation for Aboveground Pipeline Supports

Dear Mr. Feldhahn:

Hilcorp Alaska, LLC (Hilcorp) plans to conduct a construction project that will involve soil disturbance at the Swanson River Facility, Alaska. This letter is Hilcorp's official agency notification of the project in accordance with the requirements of the Swanson River Facility Soil Management Plan for PCBs (Soil Management Plan, or "Plan").

The project involves the installation of two new pilings to support new above ground piping. The piling will extend to a depth of approximately 8 feet (ft) below ground surface (bgs) and have a diameter of approximately 12-inches, and requiring an approximately 24-inch wide hole for installation. The approximate locations of the pilings are indicated on Figure 1. The construction site work is planned for the summer of 2024.

Hilcorp will conduct the project in accordance with applicable requirements of the facility's Soil Management Plan. Analytical results will determine reuse or disposal options for the soil. Soil characterized as containing polychlorinated biphenyl (PCBs) greater than (>) 10 milligrams per kilogram (mg/kg) will be sent offsite for disposal to a Treatment Storage and Disposal Facility (TSDF) permitted to accept the PCB remediation waste. Soil characterized as having PCBs less than or equal to (\leq) 10mg/kg will remain onsite for reuse per the Soil Management Plan. Specific sampling and soil management activities planned for the project are summarized below, with all references to sampling referring to sampling and analysis of PCBs.

Soil Borings (24-inch diameter, 8 ft deep)

1. Surface soil samples will be collected at the location of the two pilings to characterize the surface soils (0-2 ft bgs). If PCBs > 10 mg/kg are detected, the

upper two feet of soil at this location will be hand dug within the footprint of the planned boring and containerized for offsite disposal.

2. Due to the presence of numerous underground utilities and pipelines in the proximity of the planned piling installation, a vacuum truck will be used to remove soil to a depth below where utilities and pipelines are anticipated to be encountered (approximately 0 to 8 feet bgs).
 - a. The vacuum truck contents (< 1 cubic yard) from each boring location will be discharged onto a liner for temporary storage and sampling. One 5-part composite sample will be collected from each resulting stockpile for PCB analysis. The soil from each stockpile will be managed based on the detected PCB concentration in accordance with the Plan.

Following the completion of the project, a report will be prepared for submittal to the EPA and other agencies summarizing project activities and findings. The facility-wide data tables and maps of PCB soil concentrations will be updated as part of the reporting process.

If you have questions concerning this notification or require additional information, please contact me at (907) 777-8308 or by email at marshall.farris@hilcorp.com.

Respectfully,

Marshall Farris
Contaminated Sites, P&A, Remediation & Restoration Environmental Specialist
Hilcorp Alaska, LLC

CC:

Peter Cambell, ADEC
Sharon Yarwasky, BLM
Steve Miller, USFWS

Attachments:

Figure 1: Site Map with Planned Piling Locations

Reference

SLR International Corporation (SLR). 2023. Swanson River Facility Soil Management Plan for PCBs. Prepared for Hilcorp Alaska, LLC. November 2023.

Page Intentionally Left Blank



New Pilings - sizing 24"
8-12" diameter range
Total of 2

Meter Bldg.

Maintenance
Shop

PM Plant

Figure 1: Location of New Piling for Above Ground Pipeline Supports, Swanson River Facility.