



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

43335 Kalifornsky Beach Road, Suite 11
Soldotna, Alaska 99669
Main: 907-262-5210
Fax: 907-262-2294
www.dec.alaska.gov

File: 2337.38.007

August 21, 2024

Jason C. Michelson
Operations Lead - Central
Chevron Environmental Management Company
1500 Louisiana Street, Floor 38
Houston, Texas 77002

Re: Trading Bay Facility
Hazard ID: 1263
2024 Groundwater Monitoring and Site Investigation Work Plan
ADEC Comments – Work Plan Approval

Mr. Michelson,

The Alaska Department of Environmental Conservation (ADEC) Contaminated Sites Program has reviewed the Trading Bay Production Facility *2024 Groundwater Monitoring and Site Investigation Work Plan*. Thank you for providing this work plan which was received in our office on July 25, 2024. The work plan is approved with the following comments.

The work plan failed to address a contingency plan should the air sparge system fail. DEC considers this a potential problem, equally with the potential for the beach environment being eroded during a storm event, exposing subsurface beach NAPL and dissolved phase contamination being release directly into Cook Inlet. As the beach bluff is a dynamic environment, subject to erosion, DEC is requesting a discussion of a contingency plans for Inlet releases.

PFAS is a contaminant of Concern for the Trading Bay Facility. The Trading Bay Facility has a discharge permit for hydrocarbons to Cook Inlet that the remediation system uses for wastewater management. PFAS is not a permitted contaminant for discharge. Chevron will test the discharge of the remediation system for PFAS to assure that PFAS is not being discharged. Chevron will respond in writing regarding their intent to sample remediation system discharge for PFAS.

The 2024 Work Plan failed to address facility investigation of contaminant sources within the facility that may be contributing to off-site contamination. DEC understands the complications of the investigation and the responsibilities of both Chevron and Hilcorp in this work. We are requiring that this site investigation proceed. DEC is planning meetings with Hilcorp to discuss our concerns. As DEC has stated before, we consider Chevron jointly and severally liable with Hilcorp under Alaska law.

Chevron will develop an additional work plan to address the above concerns, working with Hilcorp as necessary. We consider contingency plans and site facility investigation long term problems that can be addressed next year. PFAS sampling will be conducted this field season.

If you have questions about this letter, or any other aspect of this 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

Cc: Craig Wilson, Stantec
Marshall Ferris – Hilcorp
Amy Peloza – Hilcorp
Andrea Carlson - DEC