

From: [Drew Anderson](#)
To: [Colvin, Rebecca A \(DEC\)](#)
Subject: Hilcorp Comment re: 18 AAC 60 Proposed Revisions
Date: Tuesday, September 22, 2020 4:17:32 PM
Attachments: [2020 0922 18AAC60 Proposed Revisions Comments - Hilcorp.pdf](#)

Hi Rebecca,

Please accept the attached letter with one comment from Hilcorp regarding the proposed revisions to 18 AAC 60.

Thank you

Drew Anderson, PE PMP | Environmental Engineer | Hilcorp Alaska, LLC
3800 Centerpoint Dr., Ste. 1400 | Anchorage | AK | 99503
Office: 907.777.8488 | Cell: 907.382.0987

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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

Date: September 22, 2020

To: Rebecca Colvin
Alaska Department Environmental Conservation
Division of Environmental Health
555 Cordova Street
Anchorage, AK 99501

Subject: Proposed Changes to Landfill Monitoring Regulations

Dear Ms. Colvin:

Hilcorp Alaska, LLC (Hilcorp) appreciates the opportunity to review and comment on the proposed changes to the Alaska Department of Environmental Conservation Landfill Monitoring Regulations. As part of this process, Hilcorp submits the following comment:

Hilcorp opposes the removal of Table F in 18 AAC 60.840 without replacing it with a clear process to identify constituents requiring monitoring. The proposed discretionary language that replaces Table F will increase uncertainty for landfill water monitoring programs and may lead to inconsistent application of the regulations throughout Alaska. Hilcorp respectfully requests greater clarity in the regulations regarding the potential constituents for which monitoring may be required. Further, Hilcorp requests a clear description of the rationale and thresholds used by the Alaska Department of Environmental Conservation for specific constituent monitoring requirements.

Again, Hilcorp appreciates the opportunity to participate in this public process, provide comment, and seek clarification in regulatory requirements.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Drew Anderson', written over a light blue grid background.

Drew Anderson, PE PMP
Environmental Engineer
Hilcorp Alaska, LLC