

# TRANSPORTATION AND DISPOSAL CLOSURE REPORT PCB WASTE TRANSPORT AND DISPOSAL PROJECT Port Heiden, Alaska

#### December 2013

Contract No. W911KB-11-C-0026 Bethel Services Inc. Project No. 2011103

Prepared For:

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This report has been prepared by Bethel Services Inc. (Bethel) and has been reviewed and approved for distribution.

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#### **Acronyms and Abbreviations**

ADEC Alaska Department of Environmental Conservation

Aniakchak Aniakchak Contractors LLC

Bethel Bethel Services Inc.

CES Civil Engineering Squadron
CFR Code of Federal Regulations

CY cubic yards

CWMN Chemical Waste Management of the Northwest

DOT U.S. Department of Transportation

DNR Alaska Department of Natural Resources

ELM Solutions Corporation

EPA U.S. Environmental Protection Agency

FAR Federal Acquisition Regulation FWS U.S. Fish and Wildlife Service Global Global Diving and Salvage, Inc.

Jacobs Engineering
mg/kg milligrams per kilogram
NVPH Native Village of Port Heiden

NVPA CA Native Village of Port Heiden Cooperative Agreement

PCB polychlorinated biphenyl

ppm parts per million

POP Period of Performance

T Short Tons

TSCA Toxic Substances Control Act

TSDF Transportation, Storage, and Disposal Facility

USACE United States Army Corps of Engineers

USAF United States Air Force WM Waste Management

WTDP Waste Transport and Disposal Plan

#### **EXECUTIVE SUMMARY**

In September 2011, the United States Army Corps of Engineers (USACE), on behalf of the United States Air Force (USAF), retained Bethel Services Inc. (Bethel) to package, manifest, transport and dispose approximately 15 tons of polychlorinated biphenyl (PCB)-contaminated soil regulated under the Toxic Substances Control Act (TSCA), and 15,000 tons of non-TSCA regulated soil from Port Heiden, Alaska. The soil was previously characterized and stockpiled by Jacobs Engineering (Jacobs) under a separate contract. Characterization results established that PCB concentrations in soils to be removed from Port Heiden ranged from 1 to 60.6 parts per million (ppm); soils with PCB concentrations above 50 ppm are regulated under TSCA.

In January 2012, USACE issued Modification 001 to the contract in accordance with Federal Acquisition Regulations (FAR) Clause 52.217-7 to exercise increased quantity options for the disposal of an additional 15 tons of TSCA-regulated waste and an additional 22,000 tons of non-TSCA-regulated soil. The original period of performance (POP) anticipated that work would take place in 2011 and 2012. Due to unanticipated weather delays affecting barge transport in 2012, Modification 002 (dated November 2012) extended the original POP from December 31, 2012 to December 31, 2013, allowing for final transport and disposal to be completed in 2013. Modification 002 also changed the contract unit for tracking contaminated soil from tons to cubic yards (CY) to account for the Port Heiden soils being less dense than anticipated. This change is discussed in Section 4.2 of the report.

During the 2011 and 2012 field seasons, Bethel placed pre-staged TSCA-regulated and non-regulated waste soil into super sacks and weighed, manifested, placarded, labeled, and otherwise prepared the waste soil for transport through United States and Canadian waters. Bethel loaded the waste soil onto barges and managed the following: shipping by barge to port facilities in Washington State; transfer of waste soil to the Union Pacific Rail Yard for loading into rail cars; and transport to, and disposal at, appropriately-regulated Transportation, Storage, and Disposal Facilities (TSDFs). TSCA-regulated wastes were disposed at the Chemical Waste Management of the Northwest's (CWMN's) TSDF Landfill and non-regulated wastes were disposed of at Waste Management, Inc.'s (WM) Columbia Ridge TSDF; both located near Arlington, Oregon. Final disposal of identified TSCA and non-TSCA soil volumes was completed on August 26, 2013. From October 2011 to August 2013, a total of 50 tons (51.7 CY) of TSCA-regulated waste and 20,282 tons (25,628 CY) of non-TSCA wastes were removed from Port Heiden, transported and disposed.

Specific waste disposal amounts are summarized in Tables 1 and 2 in Section 3.0 of the report. Bethel provided USACE with Certificates of Disposal for the TSCA-regulated soil in accordance with 40 Code of Federal Regulations (CFR) 761. Copies of Certificates of Disposal for the completed project are provided in Appendix A of the report.

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#### 1.0 INTRODUCTION

Bethel Services Inc. (Bethel) was retained by the United States Army Corps of Engineers (USACE), on behalf of the United States Air Force (USAF) 611<sup>th</sup> Civil Engineering Squadron (CES) to provide services to remove, transport, and dispose of polychlorinated biphenyl (PCB)-contaminated soil stockpiles from Port Heiden, Alaska. Port Heiden is located 424 air miles southwest of Anchorage, Alaska on the north side of the Alaska Peninsula and is accessible by air and water transportation only.

The United Stated Air Force constructed and operated a Distant Early Warning Radio Relay Station near the Village of Port Heiden between 1955 and 1981. PCB-impacted soils were recently identified on the gravel road providing access to the radio station site from the Port Heiden airport (known locally as "Site Road").

USACE, under separate contract, removed and stockpiled PCB-impacted soils from site road for later packaging and transport. PCB concentrations in the majority of the soils removed were found to range from 1 to 49 milligrams per kilogram (mg/kg) and are not considered to be a hazardous waste under the Toxic Substances Control Act (TSCA). A limited volume of soil with PCB concentrations of 50 to 60.6 mg/kg were identified and were segregated for management, transportation, and disposal as hazardous waste under the provisions of TSCA.

The scope of work awarded to Bethel involved the packaging, staging and transport of PCB impacted soils from the stockpile locations to final disposal at off-site, regulated and licensed Transportation, Storage, and Disposal Facilities (TSDFs). The contract work was awarded in 2011 with initial contract quantities of 15,000 tons of non-regulated soil and 15 tons of TSCA regulated soil. The contact quantities were increased in 2012 through the exercise of contract options to include an additional 22,000 tons of non-regulated soil and an additional 15 tons of TSCA regulated soil.

General details of the scope of work, work completed, contract changes, and problems encountered and resolved are discussed within this Transportation and Disposal Closure Report.

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#### 2.0 SCOPE OF WORK

The contract for this project was executed on September 16, 2011 and field work in Port Heiden began on September 28, 2011. Field work and waste disposal was completed by August 26, 2013. Key elements of the scope of work conducted and completed by Bethel are summarized in the following sections.

#### 2.1 Planning Documents

Bethel prepared and submitted a Waste Transportation and Disposal Plan (WTDP) in September 2011 to cover the planned work to be accomplished in 2011. A second plan was prepared and submitted in July 2012 to cover the remaining scope of work. The WTDPs provided an overview of the work, management, and waste tracking activities and procedures that would be used during each of the two planned field seasons. The WTDPs were provided to USACE and USAF 611<sup>th</sup> CES in draft form for review and comments were resolved and incorporated into the final documents. The period of performance (POP) was extended into 2013 to account for weather delays and soil removal schedules. Accordingly, the 2012 WTDP was modified appropriately to cover work occurring in 2013.

In addition to preparing the WTDPs, Bethel provided documentation that the TSDFs selected for disposal of the PCB impacted soils were in compliance and appropriately licensed and certified. TSCA-regulated soils were transported to a TSDF operated by Chemical Waste Management of the Northwest (CWMN) near Arlington, Oregon and non-TSCA regulated soils were disposed of at the Columbia Ridge Recycling and Landfill Facility operated by Waste Management, Inc. (WM) also located near Arlington, Oregon.

#### 2.2 Waste Containers

Bethel procured and delivered waste containers to the project site for use in packaging and transporting PCB impacted soils. Super sack, soft sided containers were selected for use on this project based on cost, ease of handling, containment, and worker safety. Initially, soils were packaged in super sacks with a nominal capacity of five cubic yards (CY), as this size of super sack is readily available in the market. As the project progressed, super sacks with a nominal capacity of 10 CY were used to reduce the amount of handling necessary to move the contaminated soils. The larger super sack size is generally special-order and requires lead time for manufacturing that precluded starting the project with the larger containers. The actual volumes of the super sacks, as indicated in the manufactures specifications, are 4.7 CY and 9.3 CY respectively. As the super sacks are filled in a frame that generally maintains the empty dimensions, the actual specified capacity has been used to estimate volumes in this report.

The super sacks used on the Port Heiden project were specified to meet requirements for Type I Industrial Packaging requirements under US Department of Transportation (DOT) specifications. Super sacks were used for packaging and transporting both TSCA regulated and non-TSCA regulated soils. Super sacks and appropriate filling, lifting, and transportation equipment were delivered to the site by barge.

#### 2.3 Waste Profiles

Analytical results and other waste information provided to Bethel by the USACE were used to prepare Waste Profiles for the Port Heiden soils. In September 2011, Bethel submitted Non-hazardous Waste Profile Sheet 109179OR and Hazardous Waste Profile Sheets OR306163 and OR306164 to the U.S. Environmental Protection Agency (EPA). EPA provided concurrence on September 27, 2011. Though the course of the project, PCB-impacted soils were also tracked, transported, and disposed under Waste Profile numbers 109179ORL, and 109325OR. Waste Profile Sheets were updated, as necessary, to keep them current throughout the period of project performance.

#### 2.4 Manifest Packages

Bethel prepared complete manifest packages for shipments of contaminated soil from Port Heiden. Manifest packages included:

- Uniform Hazardous or Non-Hazardous waste manifests as appropriate for each shipment.
- PCB control sheets and Land Disposal Restriction Notifications as applicable.
- Certified Generator Waste Material Profile Sheets and appropriate back-up.
- Signed Canadian Waste Transportation Manifests and Transit Notices, as applicable
- · Bills of lading.

Manifest packages were provided to the USACE and USAF for review and approval and then provided to the appropriate TSDF prior to disposal. Certificates of Disposal were provided by the TSDF operators upon acceptance of the soil.

#### 2.5 Placards and Waste Container Labels

Each super sack of soil was assigned a unique tracking number and was appropriately labeled as hazardous or non-hazardous. Appropriate DOT hazard Class labels were provided or each container and labeling was developed and applied so as to remain in place throughout loading, transportation and acceptance at the TSDF. Appropriate placards and documentation were in place on transport vehicles.

#### 2.6 Site Supervision, Field Work

To the extent practicable, equipment and labor available in Port Heiden were utilized in the execution of this project. Equipment and labor were procured through the local Subcontractor Aniakchak Contractors, LLC (Aniakchak). Aniakchak provided heavy equipment, trucks, labor, and housing for Bethel personnel. Bethel provided supervisory personnel, who were on site during field operations, as well as additional equipment and labor as required to support the field efforts.

Bethel personnel provided overall project management, oversight of stockpile management, super sack filling and transport, super sack staging and storage, loading of barges for transport from Port Heiden, unloading of barges at the Port of Seattle in Seattle, Washington, transfer to and loading onto rail cars, and transportation of soils to the designated TSDFs. In general, the field procedure consisted of the following steps:

Safety briefings were conducted at the beginning of each work shift.

- Stockpiled PCB impacted soils were uncovered and super sack filling was established within a containment area prepared adjacent to the stockpile.
- Super sacks were filled, closed, weighed, labeled, manifested, and loaded onto low-boy trailers for transport to the barge loading area.
- Loaded super sacks were staged at the barge loading area.
- When transport barges arrived, super sacks were loaded onto a lighter barge for transfer to larger transport barges. As there are no dock facilities located at Port Heiden with a sufficient draft to for large barges, lighter barges were used to transfer soils from shore to larger sea-going barges. Loading of the lighter barge was accomplished by building a temporary earthen ramp to access the beach where the barges were landed. Wave and current action required that the barge be repositioned during loading in 2011. In 2012, steel pipe piles were installed at the barge loading location to facilitate mooring of barges and improve barge operations. In 2013 10-CY super sacks were filled with clean soil and used to protect the temporary ramp from erosion. The earthen ramp was removed at the end of each field season; however, the steel piles were left in place and ownership was transferred to the village for Port Heiden for future use.

In 2011 the super sacks of soils were transported to Dillingham, Alaska where they were transferred to a larger, commercially scheduled barge for transport to the Port of Seattle in Washington State. For 2012 and 2013 transfer from the lighter barge to the transport barge took place at sea where the larger barges were anchored.

- Super sacks were secured on the transportation barge for shipment.
- Soils were shipped to the Port of Seattle where super sacks were unloaded from the barge, placed in trucks, transported to the Union Pacific rail yard, loaded into rail cars, and transported to the appropriate TSDF near Arlington, Oregon.
- Soils were accepted and processed by the appropriated TSDF for final disposal, and Certificates of Disposal were prepared and provided by the TSDFs.

At the conclusion of the field work, remaining onsite materials and equipment were sold to local residents, sold to other contractors for use on future projects at Port Heiden, or removed from the site by barge. Details of the field work completed in 2011, 2012, and 2013 are provided in Section 3.0. Copies of the Certificates of Disposal are provided in Appendix A and a photographic log of field activities is provided in Appendix B.

#### 2.7 Project Coordination

Throughout the POP, Bethel coordinated with the Native Village of Port Heiden (NVPH), USACE, USAF, EPA, Alaska Department of Natural Resources (DNR), The U.S. Fish and Wildlife Service (FWS), the U.S. Coast Guard, Environment Canada, Curyung Tribal Council, and other contractors. Key correspondence and coordination efforts to keep project stake holders informed and coordinate efforts required for successful project completion are detailed in project monthly reports submitted during periods of activity throughout the POP.

#### 2.8 Progress Reporting and Waste Tracking

Bethel prepared and submitted daily reports during active field work and monthly summary reports were provided during periods when work was progressing. These reports provided details on production, shipping, contractual and operational issues, and resolutions.

A waste tracking system was developed and implemented by assigning unique identification numbers to each super sack of waste soil. Super sacks were tracked by the identification number, weight, date of staging, date of loading, and date of disposal. Bethel concurrently prepared corresponding waste tracking summary sheets which were provided to the USACE.

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#### 3.0 WASTE REMOVAL, TRANSPORT, AND DISPOSAL

Field work was conducted at Port Heiden in 2011, 2012, and 2013 to package, transport and dispose of PCB impacted soils following the general scope of work outlined in the previous section. This section provides details of work completed in each of the three field seasons.

#### 3.1 2011 Removal, Transportation and Disposal

Bethel mobilized to the Port Heiden project site with 5-CY super sacks and other equipment in September 2011. Filling and staging of super sacks commenced on September 23, 2011 and by the end of the month, 200 super sacks of non-TSCA regulated soil and 2 super sacks of TSCA-regulated soil were loaded and staged for transport. Bethel temporarily demobilized from the site pending the arrival of the transport barge.

Late season weather conditions delayed the arrival of the transport barge until the end of October. On November 3, 2011, Bethel returned to Port Heiden and commenced loading of the staged super sacks of soil. Two 5-CY super sacks of TSCA-regulated and 112 5-CY super sacks of non-regulated waste soil were loaded on to Alaska Logistics' *Madison Rose* barge before poor weather and sea conditions prevented further loading efforts. For the 2011 transportation, the smaller *Madison Rose* was transported to docking facilities in Dillingham, Alaska where super sacks were transferred to a larger commercial barge, the *Logistics Provider*, and consolidated with other cargo bound for the Port of Seattle. During the transfer operations, a wooden flat used to transfer the 5-CY super sacks failed and one 5-CY super sack of non-regulated soil fell into the water (See Section 5.1 for details on this incident).

The remaining 111 super sacks of non-regulated soil and two super sacks of TSCA-regulated soil were transported to Seattle, Washington where ELM Solutions Corporation (ELM), a subcontractor to Bethel, took possession of the soil for transport to the TSDFs. The *Logistics Provider* arrived in the Port of Seattle in early December 2011 and the super sacks of soil were unloaded on December 8 and 9, 2011. Super sacks were removed from the barge and placed into trucks, transported to the Union Pacific Rail Yard and transferred to rail cars for delivery to the TSDFs. Soils arrived at the respective TSDFs on December 22, 2011. A total of 8.6 tons of TSCA-regulated and 556 tons of non-regulated waste soil were transported from Port Heiden to the respective facilities. Certificates of Disposal for soils transported and disposed in 2011 were provided to USACE on January 9, 2012. Copies of the Certificates of Disposal are provided in Appendix A and the quantities of soil disposed are summarized in Tables 1 and 2 at the end of this section.

Weather conditions delayed the travel of the *Logistics Provider* across the Gulf of Alaska and arrival of the two super sacks of PCB-contaminated soil regulated under TSCA was delayed beyond the 45-day window allowed in the regulations. Bethel notified the EPA by telephone and e-mail of the delay and provided the required information to the USAC/USAF necessary to submit a Waste Manifest Exception Report (See Section 5.3 for more information).

On November 15, 2011, Bethel attempted to re-mobilize to Port Heiden to load the remaining super sacks of soil. However, weather conditions prevented safe barge operations at that time. Bethel prepared a Technical Memorandum for the temporary storage of the remaining super sacks at Port Heiden for removal and transport in 2012. The Alaska Department of

Environmental Conservation (ADEC) approved the temporary storage plan and on November 23, 2011 the remaining super sacks were moved to a lined containment area and covered with a secured top liner.

#### 3.2 2012 Removal, Transportation and Disposal

Three distinct field efforts were completed in 2012: removal, transport and disposal of soils remaining from the 2011 season; packaging and preparation of PCB contaminated soils generated in 2012; and transportation and disposal of 2012 soils.

Sea ice conditions in May 2012 delayed the mobilization of a transportation barge to Port Heiden and field efforts originally planned to start in early May were delayed until May 16, 2012. The transportation barge was originally scheduled to sail from Dutch Harbor, Alaska on May 10, 2012; the barge was able to sail on May 20, 2012. Bethel personnel mobilized on May 15, 2012 to complete packaging of 2011 soils and prepare for barge transportation.

Prior to the start of barge operations, five 24-inch diameter, 60-foot long galvanized pipe piles were installed in the inter-tidal zone at the barge loading area to provide mooring for lighter barges. The piles were placed at approximately 40-, 80-, 140-, 260-, and 380-feet from shore and were driven with a vibratory hammer to an embedment depth of 40 feet. To support the installation of the mooring piles, Bethel coordinated with and secured permits from USACE, FWS, and DNR. Upon completion of the project, the mooring pilings were turned over to the City of Port Heiden for future use.

The first barge for 2012, the *Seabeck*, arrived at Port Heiden on May 21, 2012 and loading operations commenced on May 23, 2012. A total of 199 5-CY super sacks of non-TSCA regulated soil were loaded on to the barge by May 24, 2012. The *Seabeck* arrived in Seattle, Washington and the soils were off loaded June 11 and 12, 2012 and soils were accepted at the WM Columbia Ridge TSDF on June 12 and 13, 2012.

By June 20, 2012, soil stockpiled in 2011 had been placed in 10-CY super sacks which were staged for transport. At the completion of the initial field effort, soil stockpiles from 2012 activities were not ready for loading and transport; accordingly, Bethel temporarily demobilized from Port Heiden. During this demobilization, one of the front loaders supplied by the local contractor, Aniakchak, to support field operations became inoperable. Bethel arranged to barge another loader to the project site in time to support the remaining 2012 field work.

On July 10, 2012 the second field effort started and soils generated during the 2012 field season were loaded into super sacks and staged for transportation. Bethel was informed that 900 tons of soil was generated under the Native Village of Port Heiden Cooperative Agreement (NVPH CA). Soils generated by the NVPH CA were processed and transported concurrently with soils generated by Jacobs Engineering Inc. (Jacobs) under a separate contract with USACE; transportation and disposal documentation were managed to clearly indicate the correct generator of the soil. This second field effort for the season was completed on August 2, 2012 with approximately 14,000 CY of soil in 5- and 10-CY super sacks staged for transport.

The third and final field effort for 2012 began on August 16, 2012 with five barges (*Seabeck*, *Western*, *Eglon*, *KRS 230-7*, and *KRS 200-10*) mobilizing to Port Heiden. Lighter operations were carried out at high tide between August 22 and September 11, 2012 to load the transport barges.

By the conclusion of the effort to load the initial five barges, weather conditions were delaying barges en-route from Alaska to Seattle, Washington. Although there were still packaged soils in Port Heiden, Bethel determined that additional barge operations during 2012 could not be safely conducted.

Barges arrived and were unloaded in Seattle, Washington between September 20 and October 11, 2012. 41.4 tons of TSCA-regulated soils were transported to the CWMN TSDF for disposal and arrived at that facility on October 12, 2012. Non-regulated soils from the final five barges were transported to the WM Columbia Ridge TSDF and arrived at that facility between September 21 and October 18, 2012. Including the non-regulated soil disposed in June 2012, 11,812 tons of non-regulated waste soil were removed from Port Heiden and transported to the Columbia Ridge TSDF for disposal in 2012. Certificates of Disposal for soil disposed in 2012 were provided to USACE/USAF on March 14, 2013 and copies are provided in Appendix A.

Approximately 10,500 CY of packaged, non-TSCA regulated soil remained in Port Heiden when barge operations were suspended at the end of the 2012 season. A Technical Memorandum was prepared and approved by ADEC to store the remaining soil in Port Heiden over the winter for transport in 2013. The remaining super sacks of soil were placed in a lined containment area and covered with a liner. The remaining super sacks were staged and covered on October 8, 2012. The POP for the contract was extended to December 31, 2013 under Modification 002 to accommodate removal of the remaining soils.

In 2012, a discrepancy was noted in the weight to volume ratio for waste soils that had been assumed in the contract documents. The contract unit of measure was revised through a nocost change to the contract from tons to CY to better facilitate project tracking. See Section 4.2 for additional information.

#### 3.3 2013 Removal, Transportation and Disposal

Field work for 2013 began in early July 2013 and three barges (*Seabeck*, *Klinkwan*, and *Baranof Provider*) arrived in Port Heiden between July 5 and 8, 2013. The Baranof Provider was the lighter barge used to transfer super sacks to the other two barges. Lighter operations were initiated and the remaining 1,126 super sacks of non-regulated soils were loaded. The two transport barges departed Port Heiden between July 11 and 15, 2013 and arrived in Seattle, Washington between July 25 and 28, 2013.

Certificates of Disposal document 7,914 tons of non-regulated waste soil were disposed at the WM Columbia Ridge TSDF between 26 July and 5 August 2013. Certificates of Disposal for 2013 are provided in Appendix A. No TSCA regulated soils were transported in 2013.

#### 3.4 Soil Disposal Summary

Table 1 presents a summary of non-TSCA regulated PCB-impacted soils removed, transported and disposed during the POP for this contract. Over the course of the project, 20,282 tons of non-TSCA regulated PCB impacted soils were removed from Port Heiden and delivered to the Columbia Ridge TSDF for disposal. Table 2 provides a summary of TSCA-regulated PCB impacted soils removed, transported and disposed during the contract POP. 50 tons of TSCA-regulated PCB-impacted soils were removed from Port Heiden and delivered to the CWMN TSDF for final disposal.

Volumes in the table are estimated based on the number of super sacks and the manufactures specified volume. Super Sack counts were taken from on-site loading records and tracking sheets. Waste soils are accepted at the TSDFs by weight and this reported weight has been used to develop the summary tables.

Table 1: Non-TSCA PCB-Contaminated Soil Quantities, 2011-2013

Load Event	Barge	Generator	Super Sack Size <sup>1</sup> (CY)	Super sack Count	Weight*	Volume* (CY)			
	Non-TSCA Waste Quantities								
Fall 2011	Logistics Provider	Jacobs	5	111 <sup>2</sup>	556	522			
2011 SU	BTOTAL			111	556	522			
Carina 2012	Seabeck	Jacobs	5	107	484	503			
Spring 2012	Seapeck	CA	5	92	558	432			
Fall 2012	Seabeck	CA	5	190	1,307	893			
Fall 2012		Jacobs	10	357	2,437	3,320			
Fall 2012	Western	Jacobs	10	489	3,378	4,548			
Fall 2012	Eglon	Jacobs	10	321	2,197	2,985			
Fall 2012	KRS 230-7	Jacobs	10	110	759	1,023			
Fall 2012	KRS 200-10	Jacobs	10	100	692	930			
2012 SUBTOTAL				1,766	11,812	14,634			
Summer 2013	Seabeck	Jacobs	10	635	4,604	5,906			
Summer 2013	Klinkwan	Jacobs	10	491	3,310	4,566			
2013 SU	BTOTAL			1,126	7,914	10,472			
Non-TSCA TOTAL				3,003	20,282	25,682			

T – Short Tons

Notes: 1 - Super sack size listed in the nominal capacity

2 - 112 super sacks were loaded in Port Heiden, one super sack was lost in Dillingham during barge transfer

Table 2: TSCA PCB-Contaminated Soil Quantities, 2011-2013

Load Event	Barge	Generator	Super Sack Size (CY)	Super Sack Count	Weight*	Volume* (CY)		
	TSCA Waste Quantities							
Fall 2011	Logistics Provider	Jacobs	5	2	8.6	9.4		
Fall 2012	KRS 200-10	Jacobs	5	9	41.4	42.3		
TSCA TOTAL				11	50	51.7		

#### 4.0 CONTRACT MODIFICATIONS

The original contract (No. W911KB-11-C-0026) was awarded to Bethel in September 2011 with a POP through December 31, 2012 and contract quantities of 15 tons of TSCA regulated soil and 15,000 tons of non-TSCA regulated soil. During the execution of the contract, two contact modifications were issued, as noted below.

#### 4.1 Modification 001 – Increased Quantities

The original contact included two optional tasks; Optional Task 9 for the transportation and disposal of additional quantities of non-TSCA regulated waste and Optional Task 10 for the transportation and disposal of additional quantities of TSCA regulated waste. Modification 001 (dated 20 January 2012) exercised both optional tasks in accordance with Federal Acquisition Regulations (FAR) Clause 52.217-7 for disposal of an additional 15 tons of TSCA-regulated waste and an additional 22,000 tons of non-TSCA regulated waste. Modification 001 effectively increased the total quantity of TSCA and non-TSCA waste soil disposal from a combined total of 15,015 tons to 37,030 tons.

#### 4.2 Modification 002 – Contract Units and Period of Performance

In early August 2012, Bethel notified USACE of a weight vs. volume contractual issue. The contract specified that soil quantities be tracked in tons and was based on the industry accepted average soils density of 1.5 tons per CY of soil. Under the original terms of the contract, as modified by Modification 001, 25,000 CY of soil with an anticipated weight of 37,000 tons were to be transported and disposed. However, the soil being removed was found to be less dense (as low as .84 tons per cubic yard than anticipated in the contract documents. The less dense soil impacted project progress tracking; in August 2012, an estimated 19,497 CY of soil with a cumulative weight of 16,443 tons had been prepared for transportation and disposal. Tracking the project by weight provided a percent complete calculation of 44 percent complete, while tracking by volume the contract was 80 percent complete.

The lower density soil impacted transportation of the soil, as volume, rather than weight, became the controlling factor for barge capacity and increased the number of super sacks and barges required for transport. However, waste disposal costs were based on weight and the lower density soil reduced the overall cost associated with final disposal of soils. Bethel requested a meeting with USACE representatives in October 2012 to discuss the issue. As agreed in the October 2012 meeting, Bethel prepared a request for a no-additional-cost modification to contract. Under the terms of Modification 002, the contract price was based on transportation and disposal of 25,000 CY of waste soil rather than on the 37,000 tons of anticipated weight. Bethel submitted this unit modification adjustment request to USACE on 8 November 2012. Modification 002 was issued in November 15, 2012, and adjusted the quantity/weight measurement units of disposal from tons to CY at no additional cost.

As final disposal of the soil was the primary objective of the project, and disposal was based on weight, the final quantities provided in this report are based on tonnage as recorded on the Certificated of disposal and the volume as estimated from the nominal volume of the super sacks.

Modification 002 also extended the original POP from December 31, 2012 to December 31, 2013. As noted in Section 3.2, unanticipated weather delays affecting barge transport required the extension to the POP to allow final removal, transportation and disposal to be completed in 2013.

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#### 5.0 ISSUES ENCOUNTERED AND RESOLUTIONS

Details related to specific events cited in Section 3.0 related to issues encountered and resolutions to the issues implemented during the execution of this project are provided in this section.

#### 5.1 Super Sack Recovery Effort

On November 4, 2011, while Bethel's barge subcontractor, Alaska Logistics, LLC, was transferring the super sacks from a smaller barge (*Madison Rose*) to a larger commercial barge (*Logistics Provider*) at the Dillingham, Alaska dock, a wooden flat used to transfer the super sacks failed and one 5-CY super sack of non-regulated soil fell into the water between the barges. Alaska Logistics filed a Spill Report and Incident Report with ADEC and the U.S. Coast Guard summarizing the incident. On November 15, 2011, Alaska Logistics retained Global Diving and Salvage Inc. (Global) to conduct a site visit in Dillingham to assess conditions relative to using an industrial diver to recover the lost super sack. Global concluded that a recovery effort was neither practical nor safe to attempt during the winter months when ice flows are present in the Nushagak River. Global provided a report detailing their findings and concerns, dated November 17, 2011.

Bethel submitted the Global report to USACE and participated in a November 22, 2011 meeting held at ADEC offices, wherein other options for recovery were discussed. Based on the outcome of these meetings, Alaska Logistics agreed to retain Global to return to Dillingham in the spring of 2012 and attempt to recover the super sack

On January 20, 2012, a representative from Bethel, along with representatives from the USAF 611<sup>th</sup> CES and ADEC attended two public meetings held in Dillingham to keep the public and interested parties informed. Alaska Logistics representatives were also present during these meetings.

During the week of June 4, 2012, Global returned to Dillingham with a dive team and attempted to locate and recover the lost super sack. Divers were unable to locate the super sack in the area where it entered the water or within a reasonable search distance from that point. Accordingly, parties agreed that the super sack was likely transported out to sea by ice and currents and was not recoverable.

#### 5.2 Weather Delays

In 2011 and 2012 weather conditions delayed shipping efforts near the end of the field season resulting in a need to stage filled super sacks in Port Heiden. As over-wintering filled super sacks was not in the approved work plan, Bethel prepared technical memorandums that detailed work completed during the field season, reasons for the shipping delay, amount of soil to be overwintered and provided a winter storage plan. Filled super sacks were moved to a lined storage location away from the beach, stacked and covered with a liner.

In both years high winds resulted in tears in the cover liner during the winter storage period. During winter 2011-2012, the tear in the liner was in a location that did not directly expose any super sacks and an inspection of the super sacks prior to transport found no damage or adverse effects related to the torn liner.

The cover liner was again torn by high winds in early spring 2013. As the super sacks being used were rated as Type 2 industrial packaging, the top and bottom liner in the storage area functioned as secondary containment. Since the tear occurred late in the storage season, no adverse impacts from the limited exposure of the super sacks were anticipated. The super sacks were inspected prior to transport and no adverse effects related to the torn cover were found.

#### 5.3 Exception Reports, Notices of Violation, and Discrepancy reports

Winter conditions slowed the *Logistics Provider* barge in transit from Dillingham, Alaska to Seattle, Washington in 2011. As a result, the statutory 45-day transport window mandated in TSCA regulations was exceeded for the two 5-CY super sacks of TSCA regulated soils transported from Port Heiden. Shipping delays that exceed the 45 day time frame require the submission of a Manifest Exception Report to the EPA.

The 45 day shipping window for the TSCA regulated soils ended on December 17, 2011; Bethel provided e-mail and telephone notification of the delay to the EPA on December 15, 2011 and Bethel provided the relevant information to the USACE and USAF required for submitting a Manifest Exception Report. The USAF informed Bethel that the exception report was submitted on December 16, 2011. The TSCA regulated soils arrived and were accepted at the TSDF in Oregon on December 22, 2011. See Appendix C for a copy of the e-mail notification to the EPA and a copy of the e-mail from the USAF noting that the reporting requirement was complete.

There were no Notices of Violation or Discrepancy Reports related to this project.

#### 6.0 CONCLUSION

During the period of September 15, 2011 through August 26, 2013, Bethel successfully packaged, manifested, staged, loaded, transported, transferred and disposed 50 tons (51.7 CY) of TSCA regulated, PCB impacted soils and 20,282 tons (25,628 CY) of non-TSCA regulated, PCB impacted soils from Port Heiden. Weights used to develop this report are based on the certified scales at the respective TSDFs as reported on the Certificates of Disposal provided after receipt and final disposal of the PCB impacted soils. Volume in cubic yards is based on the manufactures' specified super sack capacity and is considered to be an estimate.

The project was completed in compliance with applicable regulatory standards and reporting requirements with one Manifest Exception report required due to transportation delays due to weather. Worker safety and protection of the local environment were priorities of the project and work was completed safely and without reportable or lost time injuries.

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### **APPENDIX A**

## **Certificates of Disposal**

2011-2013

## 2011 TSCA Regulated Soil



#### **CHEMICAL WASTE MANAGEMENT OF THE NW**

17629 Cedar Springs Lane Arlington, OR 97812 (541) 454-2643 (541) 454-3279 Fax

USAF PORT HEIDEN RRS AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

#### **CERTIFICATE OF DISPOSAL**

Chemical Waste Management of the Northwest, Inc., ORD089452353, has received the following waste material and certifies that the material has been landfilled in accordance with 40 CFR part 761 as it pertains to the land disposal of Polychlorinated Biphenyl contaminated materials.

GENERATOR:

**USAF PORT HEIDEN RRS** 

MANIFEST #:

005528562JJK

LINE ITEM:

9b.1

PROFILE #:

OR306163

CWM TRACKING ID:

416822-01

RECEIVED DATE:

12/22/11

DISPOSAL METHOD:

LANDFILL

DRUM #(S)

DISPOSAL DATE

**DISPOSAL LOCATION** 

T-1 T-2 12/22/11 12/22/11 LANDFILL 14 LANDFILL 14

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate and complete.

CWMNW RECORDS DEPARTMENT

Date

01/04/12

416822

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039 . Generator ID Number 2. Page 1 of 3. Emergency Response Phone 4. Manifest Tracking Number UNIFORM HAZARDOUS 005528562 **WASTE MANIFEST** AK3210890080 2 425-638-9739 5. Generator's NSTA PHORT HEIDEN RRS 611 CES/CEAN, 10471 20<sup>th</sup> St., Suite 302 Generator's Site 1952 Propert Handling Robert 36, 36, 36, W 56 DEG 57, 53, N, 158 DEG 38, 36, W ELMENDORF AFB. AK 99506-2200 PORT HEIDEN, AK 99548 907-552-2894 Generator's Phone: 6. Transporter 1 Company Name U.S. EPA ID Number Alaska Logistics, Inc. WAD988470647 7. Transporter 2 Company Name U.S. EPA ID Number Roadlink WAH000016683 8. Designated Facility Name and Site Addres CWMNW — ARLING TON U.S. EPA ID Number 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812 541-454-2843 ORD089452353 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10. Containers 11. Total 12. Unit 13. Waste Codes and Packing Group (if any)) ΗМ No. Quantity Wt./Vol. Туре X002 GENERATOR MATERIAL NOT REGULATED BY DOT 2 BA ĸ 7963 CERTIFICATES OF TREATMENT, 30-11 Out of Service Date: 9/30/// RECYCLING, OR DISPOSAL REQUIRED ATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent, (certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a Generator's/Offeror's Printed/Typed Name 16104 Export from U.S. ort of entry/exit: Import to U.S. Transporter signature (for exports only): Date leaving U.S.: 17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Signature Month Year TRANSPORT Transporter 2 Printed/Typed Name 18. Discrepancy 18a. Discrepancy Indication Space Quantity Type Partial Rejection \_\_ Full Rejection Residue Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c. Signature of Alternate Facility (or Generator) IGNATED Month Day 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Month EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.



Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039 UNIFORM HAZARDOUS WASTE MANIFEST 21, Generator ID Number 23. Manifest Tracking Number 22. Page AK3210890080 (Continuation Sheet) 005528 2 OF 2 24. Generator's Name USAF PORT HEIDEN RRS 611<sup>th</sup> CES/CEAN, 10471: 20<sup>th</sup> St., Suite 302 ELMENDORF AFB, AK: 99508-2200 U.S. EPA ID Number Company Name 25. Transporter \_ **UNION PACIFIC RAILROAD** NED001792910 U.S. EPA ID Number \_\_\_\_\_ Company Name 26. Transporter \_\_ ORD 98 28. Containers 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 29. Total 30. Unit 27a. 31, Waste Codes and Packing Group (if any)) ΗМ Quantity Wt./Vol. No. Type GENERATOR 32. Special Handling Instructions and Additional Information Acknowledgment of Receipt of Materials Signature Month Year 34. Transporter Acknowledgment of Receipt of Materials Printed/Typed Name Signature Month Day Year 35. Discrepancy FACILITY DESIGNATED 36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

## nemical Waste Management Of The Northwest



17629 Cedar Springs Lane Arlington, Oregon 97812 541-454-2643

EPA I.D.# ORDO89452353

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## 2012 TSCA Regulated Soil



#### CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST

17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION

AK3210890080

N 56 DEG 57' 53"",W 158 DEG

PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841656JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42204501

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT Certificate # 183224

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10/09/12



#### CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST

17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORDO89452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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## Chemical Waste Management Of The Northwest

17629 Cedar Springs Lane Arlington, Oregon 97812 541-454-2643 EM J.D.# ORODES452359

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17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HELDEN RRS ATTN: MANIFEST SECTION

AK3210890080

N 56 DEG 57' 53"",W 158 DEG

PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841658JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42204601

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT

Certificate # 183225

10/09/12



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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# Chemical Waste Management Of The Northwest

17629 Cedar Springs Lane Arlington, Oregon 97812 541-454-2643

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GENERATOR



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION

AK3210890080

N 56 DEG 57' 53"",W 158 DEG

PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841657JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42204901

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT Certificate # 183226

10/09/12



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION

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## Chemical Waste Management Of The Northwest

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GENERATOR



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841654JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42205101

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT Certificate # 183227 10/09/12

at rept



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080

N 56 DEG 57' 53"",W 158 DEG

PORT HEIDEN AK 99549

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## Chemical Waste Management Of The Northwest

17629 Cedar Springs Lane Arlington, Oregon 97812 541-454-2643 EPALD# 0RD0894525S

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17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORDO89452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841660JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42205201

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT Certificate # 183228

10/09/12



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

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477057 Form Approved, CMB No. 2050-2039 Please print or type (Form designed for use on elite (12-pitch) typewriter.) Z. Page 1 of 3. Europency Response Phone 4. Manifest tracking Number UNIFORM HAZARDOUS 1. Generator 10 Windows AK3210390080 000-424-9800 rooms70473 WASTE MANIFEST Generator's Site Address (if different free meding acting 5. Germator's Name and Mailing Arthress EDEN FEES 81 6 CES/CSAN 10471 20 Bt., Suite 302 56 DEG 57" 58" N, 158 DEG 38" 50" W PORT HEIDEN, AK 99549 ELMENDOPF AFE, AK 99808-2200 907-562-2824 Generator's Phone: U.S. EPA (D Namber 6. Transporter 1 Company Name WAD988470847 Alaska Lonstics, Inc. U.S. EPA (D Namely) 7. Trensporter 2 Company Name WAHRORSIERRA B. Designated Facility Name and Site Address U.S. EPA ID Number CYMMAN-ARUNGTON 17820 CEDAR SPRINGS LANE ARLINGTON, OR 87912 561-454-2043 080000462353 10. Containers 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ® Nomber, 11. Total 亿 山油 13. Waste Godes Quartity Wt./Vol. and Pecking Group (/ arry)) No Туро XIO2 GENERATOR MATERIAL NOT REGULATED BY DOT 001 -32 4137 14 Special Handling Instructions and Addisonal Information
1. PROFILE #OR305183, PCB CONTAMINATED SOIL 50-83 PPM Maced in WMXU 200035 CERTIFICATES OF TREATMENT Out of Service Date: 8 15 12 840 # RECYCLING, OR DISPOSAL REQUIRED 15. SEKERATOR'S/DEFEROR'S CERTIFICATION: I trendry declare first title consents of this consignment are fully and accurately described above by the proper shipping name, and are described, packaged, marked and labeled/placended, and are in all respects in proper condition for transport according to applicable international and redicted governmental regulations. If export ariginant and I am the Frimary Expenses, I certify that the resolation of this constitutional continue to the terms of the attached EFA ActivoMedigment of Cons I centry that the yease minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generates) or (b) (if I p Generalor's/Offeror's Printed/Typed Warra \_ Export from U.S. Port of entry/exit lenger to U.S. Transporter signature (for exports only). Onte Jessine U.S. 17. Transporter Advansidedgment of Receipt of Materials Transporter | Pytranii Typyd Marni 1ask 12 01 18. Обстерансу 18a. Discrepancy Indication Space Partial Rejection Cuantity \_\_\_\_17ype Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number Facility's Phone: 18c Signature of Albernate Facility (or Generator) Month Day Year 19. Hizzardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

The DESIGNATED FACILITY ODESTINATION STATE (IF REQUIRED) EPA Form 8700-22 (Rev. 3-05) Preylous editions are obsolete.

20. Designated Facility Owner or Operator. Certification of receipt of hazardous malerials covered by the manifest except as noted in them 18a

Proderallyped Name

Farm Approved, OMB No. 2050-0039 Please print or type. (Form designed for use on else (12-pitch) typewriter.) UNIFORM HAZARDOUS WASTE MANIFEST 21. Generally Developed 10890080 23. Marifest Tracing Supplies <sup>22, P</sup> **Ö**F 2 007841660 (Continuation Sheet) USAF PORT HEIDEN RRS 811 CES/CEAN, 18471 20 St., Suite 302 ELMENDORF AFB, AK 98506-2200 U.S. EPA ID Number Company Name 25. Transporter UNION PACIFIC RAILROAD NED001792910 U.S. EPA ID Number Company Name 26. Transporter 28. Containers 29. Total 30. Unit 27a. 27h, U.S. DOT Description (including Proper Stripping Name, Hazard Class, ID Namber. 31. Waste Codes WLVd. and Packing Group (Carv)) No. Type Chantity 32. Special Handing instructions and Additional Information 33. Transporter Acknowledgment of Receipt of Materials Printed Typed N Year 1011 34. Trænsponter Acknowledgment of Receipt of Materials Privated Typed Name Month Day 35. Обястворинсу 36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)



## Chemical Waste Management

Of The Northwest 17629 Cedar Springs Larie Arillagton, Oregon 97812 541-454-2643

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17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841662JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42205301

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT Certificate # 183229

10/09/12



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17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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AK3210890080

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Please print or type, (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039 23. Manifest Tracking Number UNIFORM HAZARDOUS WASTE MANIFEST 21 Gerasin/ADM/MB/2 10890080 22/0F 2 007841662 (Continuation Sheet) JJK USAF PORT HEIDEN RRS 811<sup>th</sup> CESICEAN, 10471 20<sup>th</sup> St., Suite 302 ELMENDORF AFB, AK 98508-2200 24. Generator's Name U.S. EPAID Number NED001792910 3 Company Name UNION PACIFIC RAILROAD 26. Transporter U.S. EPA ID Number Company Name 26. Transporter ORD 98717.345 28. Containers 27b. U.S. DOT Description findusing Proper Shipping Name, Hazard Class, ID Number; 29. Total 30. Unit 27a. 31. Waste Codes and Packing Group (If arry)) Cuenty WEAMI, HM No. Тура GENERATOR 32. Special Harding Instructions and Additional Information 33. Transporter\_\_\_\_\_\_ Printed Typed Name Addrowledgment of Receipt of Materials 34 Transporter Advantedgment of Receipt of Materials Printed Typed Name immerman 36: Discrepancy 36, Hazardous Waste Report Management Method Coxies (i.e., pudes for hazardous waste treatment, disposal, and recycling systems) EFA Form 8700-22A (Rev. 3-05) Previous exillions are obsolete. DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)



## Chemical Waste Management Of The Northwest

17629 Cedar Springs Lane Arlington, Oregon 97812 541-454-2643 EPA LD # 0RD088452363

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17629 Cedar Springs Lane Ariington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

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Profile Number: OR306163 CWM Tracking ID: 42205401

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CWMNW RECORDS DEPARTMENT Certificate # 183230

10/09/12



17629 Cedar Springs Lane Arlington, OR 97812

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Form Approved, OMB No. 2050-0039 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) UNIFORM HAZARDOUS 1. Generator ID Number A. Manifest Tracking Number 3. Emergency Response Phone 2 Page 1 of 007841661 AK3210890080 WASTE MANIFEST 800-424-9300 rccns/ps/3 5. Generator's Name and Mailing Address
USA - MORE HEDEN FAS erator's Site Address (if different than mailing address) 511 CESICEAN, 10471 20 St., Suite 302 56 DEG 57' 53" N, 158 DEG 35' 35" W ELMENDORF AFB, AK 99508-2200 PORT HEIDEN, AK 99549 907-552-2994 Generator's Phone: U.S. EPAID Number 6. Transporter 1 Company Name WAD888470547 Alaska Lodistics, Inc U.S. EPA ID Mumber 7. Transporter 2 Company Name <u>wahddoo</u>18882 MADUAOR U.S. EPA ID Number 8. Designated Facility Name and Site Address CVMNW-ARLINGTON 17829 CEDAR SPRINGS LANE ARLINGTON, OR 97812 541-454-2843 ORD089452353 Facility's Phone: St., U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, 10, Containers 11, Total 12. Unit 9a 13 Wasse Codes and Packing Group (Farry)) WA NO Quantity НM Type XGD2 GENERATOR MATERIAL NOT REGULATED BY DOT 001 SA 4436  $\mathcal{L}_{i}$ 14. Special Handing Instructions and Additional Information
1. PROPILE #OR3U6163, PCB CONTAMINATED SQLL 50-83 PPM Acced in WINSA 200034 9/24 CERTIFICATES OF TREATMENT, Out of Service Date: 3 15 12 BAG≉ RECYCLING OR DISPOSAL REQUIRED 15. SENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placeaded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If expert shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. centify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generators/Offerors Printed/Typed Name Import to U.S. Export from U.S. Part of entryledt Date leaving U.S. Transporter signature (for exports only): 17. Transporter Advocwhedgment of Receipt of Materials Day TO AN 18. Discrepance 18a Discrepancy Indication Space Quantity Residue Partial Rejection \_\_\_ Full Rejection Manifest Reference Number. 18b. Alternate Facility (or Generator) U.S. EPAID Number Facility's Phone: SIGNATED 18c. Signature of Alternate Facility (or Generator) Year Mondis Day 19. Hazardous Wasta Report Management Nethod Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 岩 20. Designated Facility Owner or Operator: Cartification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Day Printed Typed Name 4 101

DESIGNATED PACILITY TO DESTINATION STATE (IF REQUIRED)

Jm EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMS No. 2050-0039 UNIFORM HAZARDOUS WASTE MANIFEST 21. Generato 10 Number A K 3 2 1 0 8 9 0 0 8 0 23. Manifest Tracking Number 22. Page 2 OF 2 (Confinuation Sheet) 122148 FOD JJK USAF PORT HEIDEN RRS 811 CES/CEAN, 19471 20 St., Suite 302 24. Generator's Name ELMENDORF AFB, AK 99506-2200 US.EPAD Number NED001792910 3 Company Name 25. Transporter UNION PACIFIC RAILROAD U.S. EPAID Number Company Name 26. Transporter ARD 98717345 28. Containers 27h. U.S. DOT Description (including Proper Shipping Name, Hazzer) Class. 4D Number, 29. Total 30. Ling 27s. 31. Waste Codes and Pocking Group (if any)) Quantity WLAVOL HM Nic. Type 32. Special Handling Instructors and Additional Information 33. Transporter
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# Chemical Waste Management Of The Northwest

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17629 Cedar Springs Lane Arlington, DR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"", W 156 DEG PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

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Profile Number: OR306163 CWM Tracking ID: 42205601

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CWMNW RECORDS DEPARTMENT Certificate # 183231

10/09/12



17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

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Form Approved, OMS No. 2050-0039 Please great or type. (Form designed for use on eithe (12-pitch) typewriter.) UNIFORM HAZARDOUS WASTE MANIFEST 21 General D Number A K 3 2 1 0 8 9 0 0 8 0 22. Page 23. Manifest Tracking Nursiber 2 OF 2 007 841659 SITE (Continuation Sheet) USAF PORT HEIDEN RRS 811 CES/CEAN, 10471 20 St., Suite 302 24. Generator's Name ELMENDORF AFB, AK 99505-2200 U.S. EPAID Number 3 Company Name 25. Transporter UNION PACIFIC RAILROAD NED001792910 U.S. EPAID Number A Company Name 26. Transcorter 28. Containers 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, 40 Number, 29. Total 30. Unit 274. 31. Waste Codes and Packing Group (Fany)) Quantity WLVOL HM No. Type GENERATOR 32. Special Handling Instructions and Additional Information Acknowledgment of Receipt of Materials 33. Transporter Printed Typed Name MCE IST Acknowledgment of Receipt of Materiets 34. Transporter Printed/Typed Name Day Signature Month Year mmerman 35. Cáscrepsouy 36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)



# Chemical Waste Management Of The Northwest

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### CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST

17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION

AK3210890080

N 56 DEG 57' 53"",W 158 DEG

PORT HEIDEN AK 99549

CERTIFICATE OF DISPOSAL

CWM OF THE NORTHWEST, EPA ID: ORD089452353, has received waste material from USAF PORT HEIDEN RRS on 10/04/12 as described on Shipping Document number 007841655JJK. CWM OF THE NORTHWEST hereby certifies that the above described material was landfilled in accordance with the 40 CFR part 761 as it pertains to the land disposal of polychlorinated biphenyl contaminated materials.

Profile Number: OR306163 CWM Tracking ID: 42205001

Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true accurate and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true accurate and complete.

CWMNW RECORDS DEPARTMENT Certificate # 183251

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10/11/12



#### CHEMICAL WASTE MANAGEMENT OF THE NORTHWEST

17629 Cedar Springs Lane Arlington, OR 97812

CWM OF THE NORTHWEST Federal EPA ID: ORD089452353 17629 CEDAR SPRINGS LANE ARLINGTON, OR 97812

USAF PORT HEIDEN RRS ATTN: MANIFEST SECTION AK3210890080 N 56 DEG 57' 53"",W 158 DEG PORT HEIDEN AK 99549

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Please print or type. (Form designed for use on eithe (12-pitch) typewriter.) Ferm Approved, OMB No. 2056-0039 270F2 UNIFORM HAZARDOUS WASTE MANIFEST | 21. General ALPHANEZ | 1 8 9 0 0 8 0 23. Manifest Tracking Humber 607841655 JJK (Continuation Sheet) USAF PORT HEIDEN RRS 811 CES/CEAN, 10471 20th St., Suite 302 24. Generator's Name ELMENDORF AFD, AK 99506-2200 US EPAID Number ED001792910 Company Maine UNION PACIFIC RAILROAD 25. Transporter U.S. EPAID Mumber Company Name 26. Transcorler 27b. U.S. DOT Description flacibiling Proper Shipping Neare, Hazard Class, ID Number, and Packing Group (Revy)) 25. Containers 29 Total 39. Urit HM **Committy** WLVIX. Type 32. Special Handling instructions and Additional Information 33. Transporter Acknowledgment of Recognitive Materials Printed (Cost) Signature Day 34. Transporter
Printed/Typed Name Actividately of Receipt of Meterials Signature Month Day Year ımmermac 35. Discrepancy 36. Hazardors Waste Report Management Method Codes (i.e., rades for hazardous waste treatment, disposal, and recycling systems)

# Chemical Waste Management Of The Northwest

17629 Cedar Springs Lane Arlington, Oregon 97812 541-454-2643 EPA LD # 060089452553

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LOAD NO.		 	 
MANIFEST	. ביטיב אוט		

TMBOUND T/D: 15:17:24 2012-10-04 ID: 422050 TRK ID: 200034 77160 1E 6

JUTPOUND T/D: 18:28:12 2012-10-04 ID: 422050 TRK ID: 200036 77160 U: 6 49660 1b PT 27500 1b N

MET 13.75 TOMS

12,474 kg

# 2011 Non-TSCA Regulated Soil



# COLUMBIA RIDGE LANDFILL & RECYCLING CENTER A WASTE MANAGEMENT COMPANY

18177 Cedar Springs Lane Arlington, OR 97812 (541) 454-2030 (541) 454-3312 Fax

December 29, 2011

Elm Solutions Corporation 17701 108<sup>th</sup> Ave. SE, Suite 427 Renton, WA 98055

### **CERTIFICATE OF DISPOSAL**

Waste Management, Inc. dba Columbia Ridge Landfill has received NON HAZARDOUS Waste material via the Alaska Street Transfer Facility from Elm Solutions Corporation.

Date of Disposal:

December 8th and 9th, 2011

Generator:

USAF Port Heiden RRS

Profile #:

109179OR

Total Loads:

30

Total Tons:

556.12

Waste Type:

Non-Hazardous PCS and Debris

I certify, on behalf of the above listed facility, that the above-described NON Hazardous waste was managed in compliance with all applicable laws.

Julie Valdez

NON-HAZARDOUS WASTE MANIFEST	1. Generator ID Number A K 3 2 1 0 8	2. Page	2 425-6	38-9739	PHE	acking Num	ber	
ELIME! Generator's Phone:	PORT HEIDEN RRS DES/CEAN, 10471 20 <sup>th</sup> S NDORF AFB, AK 99506 907-552-3	-2200	Generator's Site Add	USAF (	PORT HEIL 3 57' 53" M HEIDEN, A	DEN RR 158 DE K 99649	G 36' 36" W	
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	PIDGE LANDFILL AR SPRINGS LANE				U.S. EPA ID			
Facility's Phone:		(541) 454-2030		*	ORC	0871	73457	
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NON-HAZARDOUS WASTE MANIFEST (Continuation Sheet)	19. Generator ID Nurcher	20, Page	21. Wash	Trucklog Num	ol	
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# 2012 Non-TSCA Regulated Soil



### COLINERA REGE LANDFIL & RECYCLING CENT

18177 Cedar Springs Lane Arlington, OR 97812 (541) 454-2030 (541) 454-3312 Fax

July 3, 2012

Elm Solutions Corporation 17701 108<sup>th</sup> Ave. SE, Suite 427 Renton, WA 98055

# CERTIFICATE OF DISPOSAL

Waste Management, Inc. dba Columbia Ridge Landfill has received NON HAZARDOUS Waste material via the Alaska Street Transfer Facility from Elm Solutions Corporation.

Date of Disposal:

June 12th & 13th 2012

Generator:

**USAF Port Heiden RRS** 

Profile #:

109325OR

Total Loads:

27

Total Tons:

558.2

Waste Type:

Non-Hazardous PCS and Debris

I certify, on behalf of the above listed facility, that the above-described NON Hazardous waste was managed in compliance with all applicable laws.

Victoria McKinney

Special Waste Scale Clerk

Chetova Miken

NON-HAZARDOUS				·						
	1. Generator ID Number		1	Emergency Response		4. Wante Ti	•		. ,	
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### COLINERA REGE LANDFIL & RECYCLING CENT

18177 Cedar Springs Lane Arlington, OR 97812 (541) 454-2030 (541) 454-3312 Fax

July 3, 2012

Elm Solutions Corporation 17701 108<sup>th</sup> Ave. SE, Suite 427 Renton, WA 98055

# CERTIFICATE OF DISPOSAL

Waste Management, Inc. dba Columbia Ridge Landfill has received NON HAZARDOUS Waste material via the Alaska Street Transfer Facility from Elm Solutions Corporation.

Date of Disposal:

June 12th & 13th 2012

Generator:

**USAF Port Heiden RRS** 

Profile #:

109325OR

Total Loads:

27

Total Tons:

558.2

Waste Type:

Non-Hazardous PCS and Debris

I certify, on behalf of the above listed facility, that the above-described NON Hazardous waste was managed in compliance with all applicable laws.

Victoria McKinney

Special Waste Scale Clerk

Chetova Miken

NON-HAZARDOUS				·						
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18177 Cedar Springs Lane Arlingum, OR 97812 (541) 454-2030 (541) 454-3312 Fax

December 13, 2012

Elm Solutions Corporation 17701 108<sup>th</sup> Ave. SE, Suite 427 Renton, WA 98055

### **CERTIFICATE OF DISPOSAL**

Waste Management, Inc. dba Columbia Ridge Landfill has received and disposed of NON HAZARDOUS Waste material from Elm Solutions Corporation.

Date Received:

9/21 - 9/24, 2012

Transfer Facility:

La Farge

Generator:

**USAF** Port Heiden RRS

Profile #:

109179ORL

Total Tons:

3377.78

Waste Type:

Non-Hazardous PCS and Debris

I certify, on behalf of the above listed facility, that the above-described NON Hazardous waste was managed in compliance with all applicable laws.

Julii Valdez Julie Valdez

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#### COLLINGIA FIDOR LANDFAL & RECYCLING CENTE

18177 Cedar Springs Lane - Avlington, OK 97812 (541) 454-2030 (541) 454-3312 Fax

December 13, 2012

Elm Solutions Corporation 17701 108th Ave. SE, Suite 427 Renton, WA 98055

# CERTIFICATE OF DISPOSAL

Waste Management, Inc. dba Columbia Ridge Landfill has received and disposed of NON HAZARDOUS Waste material from Elm Solutions Corporation.

Date Received:

10/10 - 10/11, 2012

Transfer Facility:

Alaska Street Transfer Station

Generator:

USAF Port Heiden RRS

Profile #:

109179OR.

Total Tons:

1654.33

Waste Type:

Non-Hazardous PCS and Debris

I certify, on behalf of the above listed facility, that the above-described NON Hazardous waste was managed in compliance with all applicable laws.

Julie Valdez

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5. Transporter Company Name  English	PACIFIC RAILRO	AC		U.S. EPA K	NUMBER	IBU1 / 92918
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#### COLUMNIA REDGE LANDFILL & RECYCLEUG CENTE

18177 Ceder Spitags Land Adington, CR 97812 (541) 454-2090 (541) 454-3312 Fex

December 13, 2012

Elm Solutions Corporation 17701 108<sup>th</sup> Ave. SE, Suite 427 Renton, WA 98055

### CERTIFICATE OF DISPOSAL

Waste Management, Inc. dba Columbia Ridge Landfill has received and disposed of NON HAZARDOUS Waste material from Elm Solutions Corporation.

Date Received:

10/15 - 10/18, 2012

Transfer Facility:

La Farge

Generator:

USAF Port Heiden RRS

Profile #:

109179ORL

Total Tons:

5737.95

Waste Type:

Non-Hazardous PCS and Debris

I certify, on behalf of the above listed facility, that the above-described NON Hazardous waste was managed in compliance with all applicable laws.

Juli Valdez

Julie Valdez

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erator's Phone: ransporter 1. Company Name	907-552-28				US EPAID	المتحدث المتأثث		
BETHEL SER ansporter 2 Company Name					V.S. EPA JO	Number		
ELM SOLUTION SOLUTION STATE AND STAT	Address OGE LANDFILL				U.S. EPA ID	Mumber		
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hy's Phone:  9. Waste Shipping Name and	) Description		حصنات المستقل المستوات	0, Containers	11 Total Cuantity	12. Unit WEVal		
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22. Generator's Name USAF PORTH 811 CES/CEA ELMENDORF	SIDEN RRS N, 10471, 20" St., Suite 302 NFB, AK 09505-2200						
23. Transporter Company Name	UNION PACIFIC RAILROAL			US EPAID	NE	D00178	2910
24. Transporter Company Name				U.S. EPA (D	Number		
25. Waste Shipping Name and Description		26/ Conta	ners Type	27. Total Quantity	28. Unit WL/Vol.		
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Julie Valdez		T <sub>M</sub> (W		47		10	18 12

NON-HAZAHDOUS  I. Generator (C Number  WASTE MANIFEST  A K 3 2 1 0 8 9 0 0 9 0  Generator's Name and Melting Address	Rape 1 of 3 Emergency Response Phone 4. Weste Tracking Nur 2 900-424-9300 PHB12- Generators Site Address (it different thin malling address)	
USAF PORT HEIDEN RRS 611 <sup>2</sup> CES/CEAN, 10471 20 <sup>4</sup> St. State 302 ELMENDORF AFS, AK. 99508-2200 Senerator's Phone	USAF PORT HEIDEN RI 66 DEG 57: 53° N. 158 D PORT HEIDEN, AK 9954	EG 36'36'W
Transporter 1 Company Name  BETHEL SERVICES INC  Transporter 2 Company Name	U.S. EPA ID Number  U.S. EPA ID Number	
ELM SOLUTIONS CORP.  Designated Facility Name and Site Address:	U.S. EPA-ID Number	
COLUMBIA RIDGE LANDFILL 18177 CEDAR SPRINGS LANE		
ARUNGTON, OR 97812 (541) 484-20	0 QRD987	173457
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<b>514</b>	A K 3 2 1 0 8 9  Ring Address  PORT HEIDEN RRS  CES/GEAN, 1047 1 20 8 St.  SNDORF AFB AK 99505 2  DOT-582-28	Sulte 382 200	Signer	STO 4: ator's Site Addres	ss (if different USAF 55 DE	) PI	IDEN RI V. 168 D	05	<b>*</b>	
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#### 2013 Non-TSCA Regulated Soil



#### **WASTE MANAGEMENT**

August 21, 2013

USAF Port Heiden RRS N 56, 57'53", W 158 36'36 PORT HEIDEN, ALASKA

#### CERTIFICATE OF DISPOSAL

Waste Management, Inc. dba Alaska Street Reload and Recycle has received NON HAZARDOUS POL Soil from USAF Port Heiden RRS for ultimate disposal at Columbia Ridge Landfill.

Dates of Received:

July 2013 through August 2013

Profile #:

109179OR

Total Tons:

7913.8

Waste Type:

**POL Soils** 

I certify, on behalf of the above listed facility, that the above-described non hazardous waste was managed in compliance with all applicable laws.

Kristin Castner

Waste Management

Waste Approvals Manager - PNW

Klastrer

NON-HAZAROOUS WASTE MANIFEST	1. Generator ID Number A K 3 2 1 0 8	90080	1	Emergency Response	4-930	4. Waste T	1812.	
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6. Designated Facility Name an COLUMBIA I 18177 CEDA ARLINGTON	RIDGE LANDFILL AR SPRINGS LANE	(541) 454-	2020	*******		U.S. EPA ID		473457
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#### **APPENDIX B**

**Photographs** 



Photo 1: Contaminated soil stockpile within fenced area, 2011.



Photo 2: Uncovering a soil stockpile, 2012



**Photo 3:** Packaging and staging operation, 2012



**Photo 4:** Super sack in loading frame prepared for filling with waste soil, 2012.



**Photo 5:** Filling super sacks, 2012



**Photo 6:** Lifting filled super sack from the loading frame, 2012.



**Photo 7:** Labeling 10-CY super sack for waste tracking, 2013



**Photo 8:** 5-CY Super sacks with PCB/Hazardous waste labels, 2012

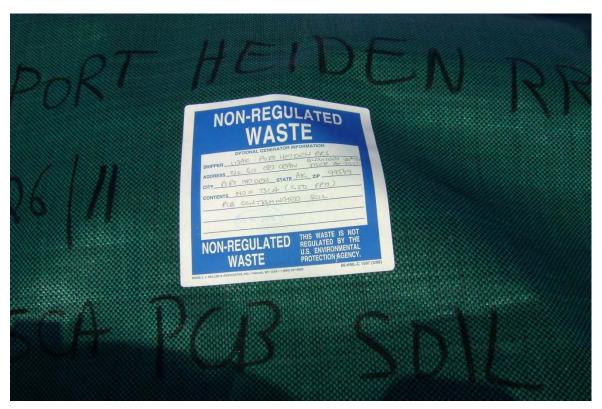


Photo 9: Non-TSCA regulated soil labeling, 2011



Photo 10: Loading low-boy trailer with 5-CY super sacks for transport to the barge, 2011



Photo 11: Loading low boy with 10-CY super sacks for transport to barge, 2012.



**Photo 12:** Transporting filled super sacks to the barge loading area, 2012.



**Photo 13:** Unloading super sacks at the barge staging area, 2012



Photo 14: 10-CY Super sacks of unregulated waste soil staged for barge loading, 2012.



Photo 15: 5-CY and 10-CY super sacks of soil staged for barge loading, 2012.



Photo 16: Constructing earth fill ramp to access barge, 2011



Photo 17: Constructing earth fill ramp to access barge, 2012



Photo 18: 10-CY super sacks filled with clean soil used to prevent ramp erosion, 2013



**Photo 19:** Steel pipe piling installed to provide mooring for barge, 2012



Photo 20: Loading the Madison Rose, 2011

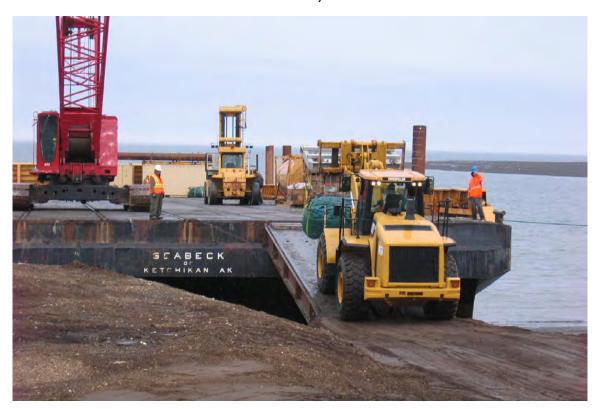


Photo 21: Loading the Seabeck, 2012



Photo 22: Stacking of 10-CY bags for transport on barge, July 2013.



Photo 23: Stacked 10-CY Non TSCA regulated super sacks, July 2013.



Photo 24: Barge loading during morning and evening high tides, July 2013.



Photo 25: Barge loaded and ready for departure on high tide, 2011



**Photo 26:** Barges with 5- and 10-CY sacks departing Port Heiden for Seattle, Washington, 2012.



**Photo 27:** Failed wooden flat that resulted in a lost 5-CY super sack at Dillingham, Alaska, 2011



Photo 28: Prepared super sack storage area, 2011



**Photo 29:** Covering super sacks for winter storage, 2012.



**Photo 30:** Off -loading super sacks from barge – Port of Seattle, August 2013.



Photo 31: 10-CY Super sacks off loaded at the Port of Seattle, August 2013



**Photo 32:** Super sacks loaded onto trucks at the Port of Seattle for transfer to the rail yard, August 2013.

#### **APPENDIX C**

#### **EPA Exception Report Documentation**

E-mail to the EPA dated December 15, 2012 E-mail from the USAF dated December 16, 2012

From:

Sean Thomas

Sent:

Thursday, December 15, 2011 4:33 PM

To:

kenknight.jeff@epa.gov

Cc:

Jadhon, David A POA; Bill Anklewich; Sean Thomas

Subject:

**EPA Manifest Exception Report** 

Attachments:

005528562JJK.PDF

Importance:

High

Mr. Kenknight-

Good day. I recently called and left you a voicemail on your office telephone (15 DEC 2011; 16:00 Alaska Standard Time) to alert you to an incoming EPA Manifest Exception Report that will be forthcoming to your attention via email and hard copy. My firm is a contractor managing a project for the U.S. Government transporting and disposing of contaminated soils from Government property in Port Heiden, Alaska to Waste Management's facilities in Arlington, Oregon.

The EPA Manifest Exception Report is required due to a slight delay in transport due to inclement weather at sea while the wastes were being transported from the origin to the Port of Seattle. Washington via regularly scheduled southbound barge services. The waste is currently in transit via rail from the Port of Seattle to Arlington, Oregon,

If you have any questions, concerns or instructions, please feel free to contact me directly or Mr. David Jadhon, Army Corps of Engineers Project Manager (cc'd). My contact information is below.

Thank you

Sean Thomas



#### **Bethel Environmental Solutions LLC**

Sean P. Thomas, RES | General Manager Bethel Environmental Solutions LLC

2605 Denali Street, Suite 100 | Anchorage, Alaska 99503

Direct 907-644-1729 | Mobile 907-360-2555 | Fax 907-522-6153

Email sthomas@bncak.com | Web www.bethelservices.com

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From:

Roth, Patrick A USAF PACAF 611 CES/CEAR <patrick.roth@elmendorf.af.mil>

Sent:

Friday, December 16, 2011 9:59 AM

To:

Sean Thomas; Jadhon, David A POA

Cc:

Pellegrino, Larry K Civ USAF PACAF 611 CES/CEOR; Bill Anklewich; John Dittrich

Subject:

RE: EPA Waste Manifest Exception Report

It's taken care of.

Pat

----Original Message----

From: Sean Thomas [mailto:sthomas@bncak.com] Sent: Thursday, December 15, 2011 4:10 PM

To: Jadhon, David A POA

Cc: Pellegrino, Larry K Civ USAF PACAF 611 CES/CEOR; pat.roth@lmendorf.af.mil; Roth, Patrick A USAF PACAF 611

CES/CEAR; Bill Anklewich; John Dittrich; Sean Thomas

Subject: EPA Waste Manifest Exception Report

Importance: High

Dave-

As we discussed on the telephone attached is the EPA Waste Manifest Exception Report and the manifest containing the two supersacks of TSCA-regulated wastes originating in Port Heiden. This waste left Port Heiden on 2 NOV 2011 and will arrive after the 45 day time window due to weather delays in transit at sea between Alaska and the Port of Seattle. The waste is currently on a train and is expected to arrive in Arlington, Oregon on Sunday, 18 DEC and be accepted at Waste Management's facilities on Monday, 19 DEC.

The attached letter requires a signature of the waste generator and submission to the EPA Region 10 representative, Mr. Jeff Kenknight, via email and hard copy (both Certified Receipt). Bethel is happy to submit the letter on behalf of the Government if so directed, once a generator signature has been procured and affixed to the attached letter.

The 45 day window closes on Saturday, 17 DEC, 2011; and as such time is of the essence for a submittal tomorrow, Friday, 16 DEC 2011. I will contact the EPA Region 10 representative directly today to inform them of the Government's intent to submit an exception report and that the completion of that activity is presently ongoing. I can make my team available tomorrow to support this activity, including picking up a hard copy letter once signed if necessary or in any other manner the Government requires.

Please feel free to contact me should you have any questions or need additional information or assistance.

Thank you,
Sean Thomas
On behalf of Bill Anklewich, Bethel Services, Inc Project Manager
Bethel Envrionmental Solutions-HZ.JPG
Sean P. Thomas, RES   General Manager
Bethel Environmental Solutions LLC 2605 Denali Street, Suite 100   Anchorage, Alaska 99503 Direct 907-644-1729   Mobile 907-360-2555   Fax 907-522-6153 Email sthomas@bncak.com   Web www.bethelservices.com

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