
# ENVIRONMENTAL POLICY

White Pass Alaska (White Pass) has adopted the following Environmental Policy, which was reviewed and approved by the Board of Directors in July 1996.

White Pass is committed to ensuring that its operations and activities are carried out in compliance with regulatory requirements. White Pass will use responsible management practices to achieve a high level of environmental protection in the communities in which we work and live. Our objective is to continually enhance White Pass's reputation as a responsible corporate citizen and a good neighbor.

Environmental management at White Pass is both a corporate and an individual responsibility. The company will establish an environmental management framework, and provide requisite resources and training, to ensure that employees are familiar with corporate expectations and requirements. Employees, in turn, will be expected to adhere to this commitment each and every day.

We will review this policy regularly to ensure that it accurately reflects both our activities and public expectations regarding corporate environmental performance.

## 1. INTRODUCTION

This briefing document has been prepared to provide a summary overview and status of the environmental remediation activities to be conducted at five sites along the Pacific and Arctic Pipelines Inc. (PAPI) pipeline between Skagway, Alaska and the Canadian border. Details of the activities to be conducted at each site are described in individual site plans (Golder Associates, 1996a-e). These plans have been submitted to the Alaska Department of Environmental Conservation (ADEC), U.S. Forest Service (USFS), and National Park Service (NPS) for review and comment. The activities to be conducted at the sites will also be discussed at a meeting with these agencies and at a public meeting to be held in Skagway on December 9, 1996 at 7:00 pm in the Skagway City School multipurpose room.

## 2. BACKGROUND

The Pacific and Arctic Railway and Navigation Company (PARN) and PAPI operated the White Pass & Yukon Route railroad and the adjacent petroleum products pipeline between Skagway, Alaska and Canada. The White Pass & Yukon Route railroad was originally constructed in 1899 to provide access between the City of Skagway in southeast Alaska and Whitehorse, Yukon Territory, Canada. It was completed toward the end of the Klondike gold rush, and was an important transportation route during World War II for personnel, equipment, and materials required for construction of airfields, pipelines and the Alcan Highway. The railroad ceased operations from 1982-1988, and since then has provided summer service between Skagway and Fraser, B.C. for the tourist industry.

In 1942, the U.S. Army constructed a four-inch diameter petroleum products pipeline next to the railway between Skagway and Whitehorse. In 1962, PAPI purchased the pipeline, and operated it through November 1994. The petroleum business was sold in mid-1995, and the tank farm in Skagway was dismantled and removed from the site in October and November, 1996. The PAPI pipeline was removed from service in 1994 and was pigged in July and August 1995 to remove residual fuel products. Dismantling and removal of the PAPI pipeline from the railroad right-of-way is planned.

Approximately 21 miles of the 110-mile long railroad and pipeline are located in the United States. The 200-foot wide right-of-way extends from the City of Skagway, and passes primarily through the Tongass National Forest and the Klondike Gold Rush National Historic Park to White Pass summit at Mile 20.7 (Figure 1). Other landowners between Mile 0 and 3.34 are the City of Skagway and the State of Alaska, who is in the process of transferring their holdings to the City of Skagway.

## 3. REQUIREMENT FOR REMEDIATION

On May 23, 1996, PARN and PAPI signed a Plea Agreement with the United States of America. Under this agreement, PARN and PAPI agreed to:

> ". . . successfully remediate all environmental contamination, consistent with all applicable federal and state regulations, at the below listed PARN and PAPI sites:
>
> a. Six-mile (including restoration of federal lands at or near the six-mile location, after review and approval by the USFS);
> b. Nine-mile;
> c. Fourteen-mile;
> d. The Skagway tank farm;
> e. The PAPI pipeline."

The location of these sites is shown in Figure 1.

## 4. SITE ENVIRONMENTAL ISSUES

### 4.1 6-Mile Site Rock Removal and Pipeline Break/Petroleum Spill

Rock was removed with the intention of straightening the rail line as it crosses the bridge at the 6-Mile site. A portion of the rock removal was conducted on USFS land without the permission of the Forest Service. Part of the rock debris was used for ballast on the rail bed and other rock was used at the dock in Skagway. The blasting left the 6-Mile area scarred. On October 1, 1994, during rock removal operations, the PAPI petroleum products pipeline was broken, and there was a discharge of petroleum.

### 4.2 9 Mile Site Debris Filled Area

The 9-Mile site contains a debris pile adjacent to the railroad that includes discarded drums; two of the drums were found to contain liquids, which were subsequently identified to be used oil and detergent by a PARN employee.

### 4.3 14 Mile Treated Timber and Sorbent Booms Pile

In the fall of 1994, the White Pass dock in Skagway collapsed. Timber piles from the dock and sorbent booms from the 6-Mile site petroleum spill were removed and transported to

the 14-Mile site by rail in the spring of 1995. A permit to burn this debris was issued by the City of Skagway, but was revoked by the USFS.

### 4.4 Skagway Tank Farm Contaminated Soil and Groundwater

The above ground tanks and interconnecting piping at the Skagway Tank Farm were demolished and removed from this site in October and November 1996. This work was completed in accordance with a Closure Plan approved by the Alaska State Fire Marshall and a Hazards Evaluation. Inspection of the site and initial sample results indicate that the site soils and groundwater are contaminated with petroleum products.

### 4.5 PAPI Pipeline Removal From Skagway to White Pass

Dismantling and removal of the above ground PAPI pipeline from the railroad right-of-way is planned. Soil along the pipeline may be contaminated with petroleum products.

## 5. ACTIVITIES CONDUCTED

As required by the Plea Agreement, Golder Associates was retained as an independent outside consultant to assist PARN and PAPI with the environmental remediation at the five sites. Golder Associates completed an environmental site assessment and preliminary remedial option evaluation for the 6-Mile site on July 17, 1996 (Golder Associates, 1996f), a preliminary environmental site assessment for the 9-Mile site on July 18, 1996 (Golder Associates, 1996g), and a hazard evaluation survey of the Skagway Tank Farm on August 9, 1996 (Golder Associates, 1996h). Subsequent activities and evaluations at the five sites are described in the individual remediation plans (Golder Associates, 1996a-e). The proposed remediation plans for each of the five sites are summarized in the following section.

## 6. PROPOSED REMEDIATION PROJECTS

### 6.1 6-Mile Site Environmental Remediation and Rock Restoration

The above-ground PAPI pipeline is located on the east side of the railroad at 6-Mile. The pipeline was broken approximately 150 feet north of the East Fork Skagway River bridge crossing. When it broke in October 1994, Arctic diesel was discharged onto the east side of the railroad embankment, and flowed overland and through coarse fill material toward the East Fork Skagway River. When the environmental assessment was conducted in November 1995, an estimated 1,000 to 2,500 cubic yards of material, located in a 50-foot by 100-foot area within the PARN right-of-way, was estimated to contain hydrocarbon concentrations above the estimated cleanup level of 200 mg/kg (Golder Associates, 1996f).

### 6.1.1 Environmental Remediation

Of the remedial options evaluated, *in situ* (in place) treatment by bioremediation was the most feasible. A laboratory treatability study was completed to determine which one of

three bioremediation approaches is optimal for the site. The preferred approach is to apply slow-release fertilizer to enhance the currently ongoing *in situ* bioremediation. The remediation plan includes a site monitoring program for conducting soil vapor, groundwater, and surface water sample collection and chemical analyses to ensure that the *in situ* treatment program is progressing and that no unacceptable discharges are occurring. The monitoring will continue until contaminant concentrations are reduced to acceptable levels, which will be confirmed by soil sampling and chemical analyses.

### 6.1.2 Rock Restoration

The proposed restoration of the rock beyond the limits of the right-of-way includes terracing the existing rock face, and utilizing the remaining rubble to fill in the depressions. The hillside will be reshaped, seeded, and trees planted. White Pass officers have discussed the remediation plans with Forest Service officials. Representatives of the Forest Service will be involved in the rehabilitation of this area.

### 6.2 9-Mile Site Environmental Remediation

The 9-Mile site contains a 230-foot long by 80-foot wide debris-filled area adjacent to the west side of the railroad bed within the PARN right-of-way, which is about 350 feet southeast of, and 200 feet above, the Skagway River. Air dump side cars were used between 1990 and 1992 to dispose of debris that may have originated at the Skagway maintenance shop. The debris is expected to consist primarily of dimension lumber, timbers, treated wood, empty drums, used oil filters, tires, concrete, and occasional scrap metal pieces. Two drums were found to contain liquids, which were subsequently identified to be used oil and detergent by a PARN employee.

Surface water sampling conducted during an October 26, 1995 site reconnaissance, indicated that no hazardous chemicals have been, or were currently, discharging into the environment (Golder Associates, 1996g). Laboratory results from the June 26, 1996 surface water sampling suggested low levels of diesel range organics and low levels of chlorinated organic chemicals and gasoline consituents in the samples. The analytical laboratory has reviewed this data and indicated that these samples contained contamination from the laboratory. The remediation plan includes continued site monitoring of surface water, debris removal, inspection, waste segregation and disposal, and subsequent soil sampling and analysis to assess environmental contamination at the site.

### 6.3 14-Mile Site Environmental Remediation

Approximately 200 to 300 cubic yards of debris were piled in a 150-foot by 15-foot area on the south side of the railroad within the PARN right-of-way in the spring of 1995. The pile contains creosote-treated timbers from the collapse of the dock in Skagway in the fall of 1994, rail ties, and some oily sorbent booms from the cleanup of the 6-Mile site spill. The

material is covered with a reinforced polyethylene tarp, which is weighed down. The site once included a section house, coal shed, gas car shed and gasoline storage shed. Laboratory analysis of samples of the creosote-treated timbers collected on October 24, 1996 indicated that the timbers are not a hazardous waste. The remediation plan includes debris pile and sorbent boom removal and shipping to a permitted incinerator or disposal facility. In addition, an environmental site assessment will be conducted, including soil, and possibly groundwater sampling to assess environmental contamination at the site.

### 6.4 Skagway Tank Farm Environmental Remediation

The Skagway Tank Farm was built in approximately 1942 by the U.S. Army and was operated by the Army until 1962 when it was purchased by PAPI. Prior to demolition and removal from the site in October and November 1996, there were a total of 23 above ground storage tanks and connecting pipelines. Twenty-one of the tanks were located northwest of the city at the main tank farm and two tanks were located in the wharf area at the southern edge of the city (Figure 1). Several of the tanks have been out of service for an unknown number of years, including the two at the wharf. In early 1995, PAPI decommissioned the remainder of the tank farm. A contractor opened the active tanks and removed the residual petroleum products and sludge. The piping was disconnected from the tanks, and the main header lines were pigged to remove residual product. The pump station at the main tank farm is still intact and consists of an engine room, oil/water separator room, and a one room office/laboratory. Small above ground heating oil tanks are adjacent to the pump room and the office, and there is a waste oil underground storage tank and a below ground, wood lined sump pit south of the pump room.

Previous inspections and initial sampling conducted during the tank farm Hazard Evaluation survey indicate that petroleum products have been found in the soil and groundwater above estimated cleanup levels (Golder Associates, 1996h). The release investigation plan, which includes soil gas, soil, groundwater and surface water sampling, will be implemented in December 1996. The purpose of this investigation is to identify the nature and extent of releases of petroleum products and other hazardous substances at the site so that the risks to human health and the environment can be evaluated. Once this

evaluation is completed, the most appropriate environmental remediation approach can be selected and implemented.

### 6.5 PAPI Pipeline Environmental Remediation

A 20.7-mile long, four-inch diameter pipeline is located within the PARN right-of-way and is mostly above-ground, although in limited areas it is covered with up to 12 to 18 inches of ballast. The pipeline is mounted on bridges at several locations. The pipeline has not been used since November 1994, and was pigged in 1995 to remove any remaining product.

Releases of fuel have occurred, and been reported, during the 52 years of operations. Golder Associates is completing a review and evaluation of the pipeline history and historic spill information, which included a site reconnaissance of the spill sites in the summer of 1996.

All demolition of the pipeline will occur within the railroad right-of-way, and will include the use of cranes and railcars. The above-ground pipe will be cut into transportable lengths, loaded onto rail cars, and transported to Skagway for stockpiling, pending recycling as scrap. In the areas of shallow fill cover, the pipeline will be either pulled or exposed with hand shovels or rakes, and then handled in the same manner as above-ground pipe. These areas will be backfilled with imported fill as necessary to return the areas to original grade. The pipeline will be abandoned in place by capping both ends at Bridge 18A, inside or underneath the Milepost 19 Pump Station, where the pipeline crosses beneath the railroad (approximately 8 locations), under or adjacent to state highways, local roads or airports, under or adjacent to private property, and between the Skagway Tank Farm and the Skagway wharf. The pipeline may also be abandoned in place at other locations outside of the PAPI right-of-way as designated by the USFS or NPS.

Concurrent with the pipeline demolition, an environmental assessment of the pipeline will be conducted which will utilize the historic spill information and observations made during the pipeline removal to collect soil, and possibly, water samples. Laboratory results from the sampling will be used to propose a risk-based remediation of specific sites along the pipeline, if required.

## 7. REMEDIATION SCHEDULE

The schedule for implementing environmental remediation activities at the five sites is summarized below:

- 6-Mile Site - *in situ* treatment - spring to fall 1997

- 9-Mile Site - monitoring, debris removal, and sampling - spring to fall 1997
- 14-Mile Site - debris removal and environmental assessment - summer 1997
- Skagway Tank Farm - sampling investigation, risk assessment and remediation plan - winter 1997-1998
- PAPI Pipeline - demolition and environmental assessment - summer to fall 1997

Additional details are shown on the attached draft project schedule.

## 8. ENVIRONMENTAL CONSIDERATIONS

The proposed remediation projects described in Section 6 of this document are expected to have a limited short term impact on the environment during the field activities which will result in, or lead to, the long term benefit of environmental remediation of the five sites. A summary of the short term environmental impacts is provided in the following sections.

### 8.1 Erosion Control

Measures will be taken to prevent or control erosion during the remedial work at all sites as appropriate. The 9-Mile site is at an elevation of approximately 1,000 feet, and the terrain descends 200 feet to the Skagway River. The debris pile has been placed over railway fill and natural bedrock, and soil in this area is thin and patchy. Removal of the debris will not create an erosion problem, although care will be taken to prevent downhill movement of the debris during the removal. Test pits and other shallow excavations that will be used to collect soil samples at the five sites will be backfilled upon completion, which will prevent erosion.

### 8.2 Water Quality

Sampling and remedial activities are not expected to impact water quality at any of the five sites and water quality monitoring is planned at three of the sites. Water quality sampling has been conducted at 9-Mile, and the results are contained in the remediation plan (Golder Associates, 1996c). The October 1995 sampling at 9-Mile did not detect any organic chemicals, the low levels of organic chemicals found in the June 1996 samples were due to laboratory contamination, and continued monitoring prior to debris removal is planned. The *in situ* treatment proposed for 6-Mile will ensure that hydrocarbon concentrations will be reduced to acceptable levels, and groundwater and surface water quality will be monitored throughout the remediation program. Groundwater and surface water sampling are also planned at the Skagway Tank Farm. There will be no in-water work (other than sampling) during any of the site remediation activities.

### 8.3 Fish Streams

The planned sampling and remedial activities are not expected to impact fish streams. The Skagway River contains Coho and Chum salmon and Dolly Varden only in the lower six miles; they also utilize habitat in numerous side streams for rearing (Alaska Dept. of Fish and Game [ADFG], Habitat Division, 1994). Beyond this area, the rugged terrain and other natural environmental constraints preclude the presence of fish. The first major obstacle is a 25-foot high waterfall, approximately half a mile upstream of the confluence with the East

Fork of the Skagway River. An April 1994 fish survey conducted by the Alaska Power and Telephone Company (AP&T) and ADFG in the Pitchfork Falls area of the Skagway River (approximately 9.5 miles from Skagway) for the Goat Lake Hydroelectric Project found no fish in that area. Their survey showed that existing habitat conditions were extremely poor because of the high gradient and lack of overwintering and rearing habitats, and their study section of the Skagway River did not support any significant fish populations (AP&T, 1995). Surface water quality monitoring at the 6-Mile site will ensure that the slow-release fertilizer to be applied to stimulate the *in situ* bioremediation does not impact the East Fork of the Skagway River.

### 8.4 Aesthetics

Completion of the planned remediation activities is expected to improve the aesthetics of the five sites. The area adjacent to the railroad bed contains a variety of materials that have been placed over the last 100 years. Most areas contain a small amount of debris, some of which may have historic significance. Removing the debris piles at 9-Mile and 14-Mile will enhance the appearance of these areas. Restoration of the blasted rock at 6-Mile outside of the PARN and PAPI right-of-way will also improve the aesthetics of this site.

### 8.5 Cultural Resources

The White Pass & Yukon Route is a designated National Historic Landmark. On June 7, 1986, the NPS nominated the petroleum pipeline (referred to as Canol 2) for inclusion in the National Register of Historic Places. Based on a March 23, 1987 review by Alaska's State Historic Preservation Officer (SHPO), the NPS Advisory Board recommended to the NPS Secretary that Canol 2 not be included with other World War II National Historic Landmark Nominations that were being proposed for Alaska.

On June 11, 1991, the USFS issued PARN an easement for relocating 1,700 feet of right-of-way between Mile 3.34 and 3.66. During the review process, the USFS submitted a nomination request that included Canol 2. The SHPO requested a physical description of

the line. The USFS conducted a field survey and provided the additional information to support the request (Iwamoto, 1991). On November 5, 1991, the SHPO concurred that Canol 2 was eligible for listing in the National Register of Historic Places.

USFS and NPS archaeologists and the SHPO have been advised of the plans to remove the pipeline. Their recommendations for obtaining photographic documentation and for protecting other historic resources during remediation will be incorporated into the pipeline removal work. Specifically, this will include photographing the pipeline removal

operations and preconstruction training of workers of the historic significance of the pipeline and adjoining railway and structures.

### 8.6 Land Use

The railroad provides tourist transportation several times a day during the summer months. Pipeline demolition and removal activities will be coordinated to protect worker safety and avoid interference and potential delays with the scheduled service. Railcars required to remove pipe and debris from 14-Mile will be operated between or after scheduled trips. Debris removal at 9-Mile is scheduled to begin at the end of the tourist season. Activities at 6-Mile, 9-Mile, and 14-Mile are anticipated to require up to several weeks at each site, plus periodic sampling and monitoring activities. Pipeline demolition will be done over the summer; the schedule will coordinate around the tourist train schedule.

### 8.7 Land Ownership

The railroad right-of-way passes primarily through the Tongass National Forest and the Klondike Gold Rush National Historic Park. Other adjacent landowners include the City of Skagway, the State of Alaska, and the Mental Health Trust between Mile 0 and Mile 4.

## 9. REFERENCES

Alaska Dept. of Fish and Game, Habitat Division, 1994, An atlas to the catalog of waters important for spawning, rearing or migration of anadromous fishes. Southeastern Region Resource Management, Region I. Revised October 24, 1994, Effective April 28, 1995. Skagway B-1, B-1 (NW), C-1.

Alaska Power and Telephone Company, 1995, Additional information responses to AIR #4, 5, 9, 12, 13, 15, 17, 18, 20, 21 (Enclosure 1 of 2) and 23, 24, 25-34 (Enclosure 2 of 2), Port Townsend, WA. May 30, 1995.

Golder Associates Inc., 1996a, Plan for Skagway Tank Farm Release Investigation, Pacific and Arctic Pipelines Inc. Skagway, Alaska, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Golder Associates Inc., 1996b, Plan for Corrective Action at 6-Mile Site, White Pass and Yukon Route Railway near Skagway, Alaska, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Golder Associates Inc., 1996c, Plan for 9-Mile Site Restoration, White Pass & Yukon Route near Skagway, Alaska, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Golder Associates Inc., 1996d, Plan for Environmental Assessment and Restoration 14-Mile Site, White Pass & Yukon Route near Skagway, Alaska, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Golder Associates Inc., 1996e, Plan for Pipeline Demolition and Environmental Assessment, Pacific and Arctic Pipelines Inc. Skagway to Canadian Border, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

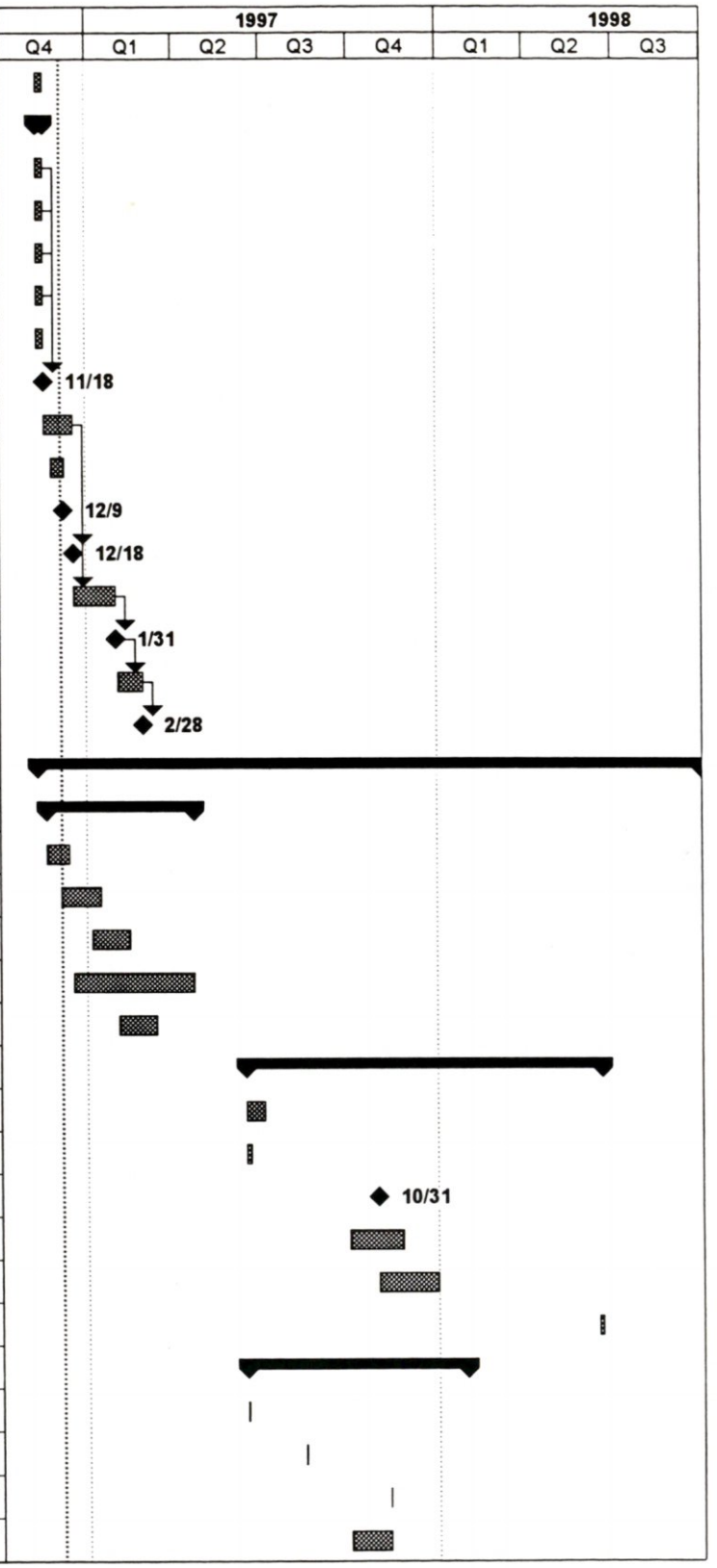
Golder Associates Ltd., 1996f, Environmental Site Assessment and Preliminary Remedial Option Evaluation for 6-Mile Site, White Pass and Yukon Route Railway near Skagway, Alaska, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Golder Associates Ltd., 1996g, Preliminary Environmental Site Assessment at 9-Mile Site, White Pass and Yukon Route Railway near Skagway, Alaska, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Golder Associates Inc., 1996h, Skagway Tank Farm Hazard Evaluation Survey, report for Bogle and Gates, P.L.L.C., Anchorage, AK. 1 vol.

Iwamoto, K., 1991, Supplemental information for the determination of eligibility for the Canol 2 pipeline and telecommunication system, Skagway, AK. Chatham Area, Tongass National Forest, Sitka, AK. 8 pp.

| ID | Task Name | Start | Finish |
|---|---|---|---|
| 1 | **Revise ERMCP** | 11/11/96 | 11/18/96 |
| 2 | **Prepare Draft Remediation Plans** | **11/11/96** | **11/18/96** |
| 3 | 6 Mile | 11/11/96 | 11/18/96 |
| 4 | 9 Mile | 11/11/96 | 11/18/96 |
| 5 | 14 Mile | 11/11/96 | 11/18/96 |
| 6 | PAPI Pipeline | 11/11/96 | 11/18/96 |
| 7 | Tank Farm Investigation Plan | 11/11/96 | 11/18/96 |
| 8 | **Submit Revised ERMCP & Draft Plans** | 11/18/96 | 11/18/96 |
| 9 | **Agency Review** | 11/19/96 | 12/18/96 |
| 10 | **Prepare for PublicMeeting** | 11/26/96 | 12/9/96 |
| 11 | **Public Meeting on Plans** | 12/9/96 | 12/9/96 |
| 12 | **Agency/Public Comment on Plans** | 12/18/96 | 12/18/96 |
| 13 | **Finalize Plans** | 12/19/96 | 1/31/97 |
| 14 | **Submit Final Plans** | 1/31/97 | 1/31/97 |
| 15 | **Agency Review** | 2/3/97 | 2/28/97 |
| 16 | **Final Plan Approval** | 2/28/97 | 2/28/97 |
| 17 | **Implement Field Activities** | **11/11/96** | **9/30/98** |
| 18 | **Tank Farm** | **11/20/96** | **4/22/97** |
| 19 | Field Investigation and Sampling | 11/20/96 | 12/13/96 |
| 20 | Laboratory Analyses | 12/5/96 | 1/15/97 |
| 21 | Risk Assessment | 1/6/97 | 2/14/97 |
| 22 | Permit Thermal Desorber | 12/18/96 | 4/22/97 |
| 23 | Report & Corrective Action Plan | 2/3/97 | 3/14/97 |
| 24 | **6-Mile** | **6/16/97** | **6/19/98** |
| 25 | Install Monitoring/Start Sampling | 6/16/97 | 7/4/97 |
| 26 | Apply Fertilizer | 6/16/97 | 6/20/97 |
| 27 | Terminate Monthly Monitoring | 10/31/97 | 10/31/97 |
| 28 | Verification Sampling | 10/1/97 | 11/25/97 |
| 29 | Evaluation and Reporting | 10/31/97 | 12/31/97 |
| 30 | Decommission Monitoring System | 6/15/98 | 6/19/98 |
| 31 | **9-Mile** | **6/16/97** | **1/30/98** |
| 32 | Surface Water Monitoring | 6/16/97 | 6/16/97 |
| 33 | Surface Water Monitoring | 8/15/97 | 8/15/97 |
| 34 | Surface Water Monitoring | 11/11/97 | 11/11/97 |
| 35 | Debris Removal | 10/1/97 | 11/11/97 |

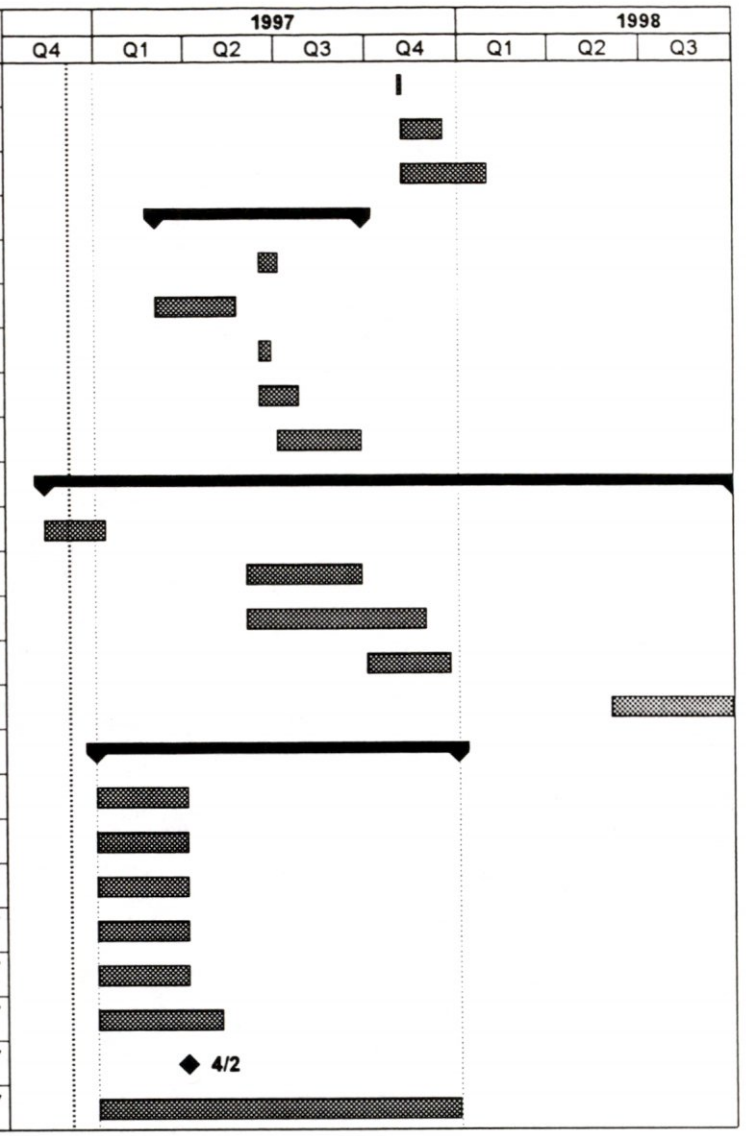



Task
Progress
Milestone
Summary

Rolled Up Task
Rolled Up Milestone ◇
Rolled Up Progress

Project: White Pass Permitting Schedu
Date: 12/5/96

| ID | Task Name | Start | Finish |
|---|---|---|---|
| 36 | Verification Testing | 11/3/97 | 11/6/97 |
| 37 | Laboratory Testing | 11/6/97 | 12/17/97 |
| 38 | Site Analysis | 11/6/97 | 1/30/98 |
| 39 | **14-Mile** | **3/3/97** | **9/25/97** |
| 40 | Remove timbers and sorbent booms | 6/16/97 | 7/4/97 |
| 41 | Site History Review | 3/3/97 | 5/23/97 |
| 42 | Site Sampling | 6/16/97 | 6/27/97 |
| 43 | Laboratory Analysis | 6/16/97 | 7/25/97 |
| 44 | Report and Remediation Plan | 7/4/97 | 9/25/97 |
| 45 | **PAPI Pipeline** | **11/11/96** | **9/30/98** |
| 46 | Historical Spill Review Report | 11/11/96 | 1/10/97 |
| 47 | Field Demolition and Removal | 6/2/97 | 9/25/97 |
| 48 | Environmental Assessment Report | 6/2/97 | 11/28/97 |
| 49 | Site Remediation Plan | 10/1/97 | 12/23/97 |
| 50 | Site Remediation | 6/1/98 | 9/30/98 |
| 51 | **Implementation of ERMCP** | **1/1/97** | **12/30/97** |
| 52 | Spill Prevention/Countermeasure Document | 1/1/97 | 4/2/97 |
| 53 | Training/Procedures Document | 1/1/97 | 4/2/97 |
| 54 | Emergency Response Plan | 1/1/97 | 4/2/97 |
| 55 | Storm Water Pollution Prevention Plan | 1/1/97 | 4/2/97 |
| 56 | Corrective Plan for Dredge Spoil | 1/1/97 | 4/2/97 |
| 57 | Identify Source of Shop TCE | 1/1/97 | 5/6/97 |
| 58 | Start Continuing Employee Training | 4/2/97 | 4/2/97 |
| 59 | Shop Site Cleanup | 1/1/97 | 12/30/97 |

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Date: 12/5/96

Task
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Milestone
Summary
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Rolled Up Milestone
Rolled Up Progress

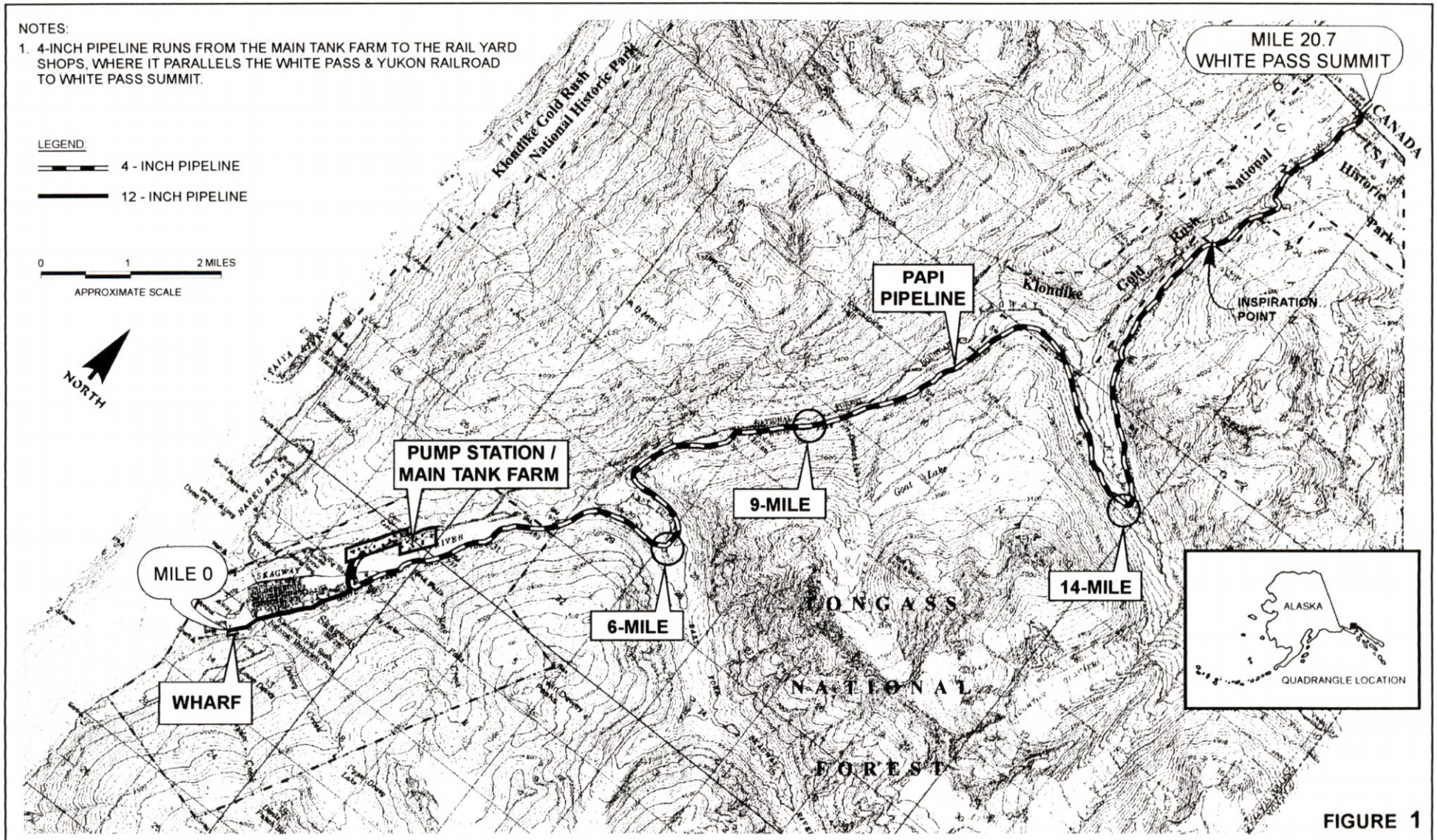


FIGURE 1

REFERENCE: U.S.G.S. TOPOGRAPHIC MAPS "SKAGWAY (B -1), ALASKA" AND "SKAGWAY (C - 1), ALASKA", 1:63,360.

# PARN AND PAPI PROJECT LOCATION MAP

WHITE PASS / WHITE PASS PERMITTING / AK

PROJECT: IC3-5110x001.002 FILE: E:\PAPITOPO.CD4 DATE:11/96 DRAWN: SJM

Golder Associates