TAURIAINEN ENGINEERING & TESTING
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**DRAFT Well Closure Report**

Date: 29 Jan 2021 20048

To: Donna Ortiz, U.S. Environmental Protection Agency (EPA)
ortiz.donna@epa.gov

Copy: Carey Foster, North Star Paving & Construction, Inc.
carey.nspci@alaska.net

Pete Campbell, Alaska Department of Environmental Conservation (ADEC)
peter.campbell@alaska.gov

From: Clayton Spitler, Project Engineer

Subject: North Star Pit, 44485 Knight Drive Soldotna, Alaska
EPA File ID: AK122PS-30-13955
Consent Agreement, Docket No. SDWA-10-2021-0002
2 Pages + Attachments

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In response to your 7 Jan 2021 e-mail request and pursuant to EPA's January 18, 2021 approval of North Star Paving & Construction Incorporated's (NSPCI's) force majeure request under the Consent Agreement, this Memo constitutes a DRAFT Well Closure Report for the injection well which served NSPCI's welding and vehicle maintenance shop at subject location. This injection well has been permanently closed in accordance with the EPA-approved 5 Aug 2020 Injection Well Closure Plan. Following is additional pertinent information, numbered correspondingly to items in our 5 Aug 2020 Injection Well Closure Plan.

1. Pressure testing of the piping between the floor drain and oil/water separator, performed 14 Sep 2020, indicated 1) that the floor drain was connected solely to the oil/water separator tank, and 2) that the piping between the floor drain and oil/water separator tank was not leaking.
2. On 31 Aug 2020, all liquid, sludge, and solid waste in oil/water separator tank was pumped to maximum extent feasible and containerized for proper disposal by NRC (National Response Corporation) Alaska. See attached waste disposal documentation. On 14 Sep 2020, the empty oil/water separator tank was carefully removed and properly disposed of. The empty tank was visually observed for signs of leakage, with no through-cracks observed and the only notable sign of potential leakage being some black and red staining below the outlet invert elevation on approximately 1/4 of the tank's circumference. Visual observation of soils directly beneath and adjacent to oil/water separator tank showed no signs of staining and/or contamination. Groundwater level in the excavation was approximately 10' below grade. On 14 Sep 2020, TriHydro performed soils analysis with a photo-ionization detector (PID) and facilitated lab soil analyses per the 5 Aug 2020 Closure Plan. (See attached TriHydro 18 Nov 2020 Report including soil and water field and lab analyses results.)
3. Piping was capped upstream of the oil/water separator tank. Piping between floor drain and capped end was then pumped full with bentonite slurry (to flush with sidewall of sump). The sump in the concrete slab remains (for future snow-melt catchment area), but bentonite slurry has filled all piping to prevent any future discharge from the sump.
4. On 14 Sep 2020, the leachfield was excavated to remove all imported drain rock, perf pipe, and backfilled soils. Visual observation of soils directly beneath and adjacent to leachfield

showed no signs of staining and/or contamination. Excavation of the leachfield was simply a lateral expansion of the excavation performed for the oil/water separator tank; groundwater level in the excavation was approximately 10' below grade. On 14 Sep 2020, TriHydro performed soils analysis with a photo-ionization detector (PID) and facilitated lab soil analyses per the 5 Aug 2020 Closure Plan. (See attached TriHydro 18 Nov 2020 Report including soil and water field and lab analyses results.)

5. As previously noted, the piping between floor sump and oil/water separator tank remains, and has been filled with bentonite slurry. All other materials (liquids, soil, concrete tank, piping, and any other materials) were removed from in and around the injection well until visibly clean soil was reached, groundwater was encountered, and/or buildings or other significant structures near the excavation were in danger of being compromised. The excavation area was limited to the west by the Shop building and to the north by a concrete pad. Soil waste has been stockpiled and covered on site and is planned to be characterized by TriHydro and properly disposed of in Spring 2021. The injection well excavation has been backfilled to at or above original grade with 1) material from the Clean Soil Stockpile as shown on Figure 1: Sample Location Map in TriHydro 18 Nov 2020 Report, and 2) clean pit run material from virgin mining area on site.

The current and potential new owners anticipate no washing of vehicles or floors in the Shop in the future. The Shop is planned to be utilized for welding only, and not automotive services. The floor sump, which remains, will be pumped out as necessary, with pumped fluids containerized and properly disposed of.

Currently, two, 55-gallon sealed drums of liquid waste and four super-sacks of solid waste associated with Travis/Peterson's monitor well installation work remain on site. Soil waste associated with injection well closure is stockpiled on existing concrete pad north of leachfield as shown on Figure 1: Sample Location Map in TriHydro 18 Nov 2020 Report.

All wastes associated with injection well closure (including monitor well installation) will be characterized for disposal purposes, in accordance with applicable Federal, State, and local regulations. Soil characterization will be performed in accordance with ADEC *October 2019 Field Sampling Guidance*. Contaminated solids are planned to be disposed of at the Kenai Peninsula Borough Central Peninsula Landfill (pending analyses results confirming materials meet landfill disposal requirements) or hauled to Alaska Soil Recycling at 2301 Spar Avenue Anchorage, Alaska for proper decontamination and/or disposal. Remaining contaminated liquids are planned to be collected on site by NRC Alaska, and properly disposed of at NRC Alaska Kenai Facility at 44066 Kenai Spur Highway Kenai, Alaska.

A final Closure Report, including waste material characterization sampling information, analyses results, and waste disposal manifests will be submitted to EPA Region 10 Ground Water Unit and ADEC after the remainder of the Closure Plan has been completed. Please contact our office if you have any comments or questions.

***End of Memo Text***

Attachments:

Oil/Water Separator Contents Waste Disposal Documentation (2 pages)
Photo Log (7 pages)
TriHydro 18 Nov 2020 Report (259 pages, digital file e-mailed to EPA separately)

*** IN CASE OF EMERGENCY CALL 800-899-4672 ***

156021 (NR)

# NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12 pitch) typewriter)

**NON-HAZARDOUS WASTE MANIFEST**

1. Generator's US EPA ID No.: EXEMPT

Manifest Document No.: 156021A

2. Page 1 of 1

3. Generator's Name and Mailing Address:
NORTH STAR PAVING & CONSTRUCTION, INC.
44484 KNIGHT DRIVE
SOLDOTNA, AK 99669

NORTH STAR PAVING & CONSTRUCTION, IN
44484 KNIGHT DRIVE
SOLDOTNA, AK 99669

4. Generator's Phone: (907) 252-3386

5. Transporter 1 Company Name: NRC ALASKA LLC

6. US EPA ID Number: AKR000004184

A. State Transporter's ID

B. Transporter 1 Phone: 907-748-7106

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address:
NRC ALASKA LLC
44066 KENAI SPUR HIGHWAY
KENAI, AK 99611

10. US EPA ID Number: AKR000203984

E. State Facility's ID

F. Facility's Phone: 907-395-4600

| HM | 11. WASTE DESCRIPTION | 12. Containers No. | 12. Containers Type | 13. Total Quantity | 14. Unit Wt./Vol. |
|---|---|---|---|---|---|
| a. | MATERIAL NOT REGULATED BY D.O.T. | 1 | TT | 76 | G |
| b. | | | | | |
| c. | | | | | |
| d. | | | | | |

G. Additional Descriptions for Materials Listed Above

1) EA0301 OILY WATER

H. Handling Codes for Wastes Listed Above

D81990

15. Special Handling Instructions and Additional Information

Shipper's Certification: This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation

**GENERATOR**

16. **GENERATOR'S CERTIFICATION:** I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

| Printed/Typed Name | Signature | Date (Month Day Year) |
|---|---|---|
| Jack Foster | Jack Foster | 8 31 20 |

**TRANSPORTER**

17. Transporter 1 Acknowledgement of Receipt of Materials

| Printed/Typed Name | Signature | Date (Month Day Year) |
|---|---|---|
| David McGee | | 8 31 20 |

18. Transporter 2 Acknowledgement of Receipt of Materials

| Printed/Typed Name | Signature | Date (Month Day Year) |
|---|---|---|
| | | |

**FACILITY**

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

| Printed/Typed Name | Signature | Date (Month Day Year) |
|---|---|---|
| | | |

NON-HAZARDOUS WASTE

# CERTIFICATE OF DISPOSAL/RECYCLE

**GENERATOR:** NORTH STAR PAVING & CONSTRUCTION, INC.
44484 KNIGHT DRIVE
SOLDOTNA, AK 99669

**DISPOSAL FACILITY:** NRC ALASKA LLC
44066 KENAI SPUR HIGHWAY
KENAI, AK 99611

**EPA ID NUMBER:** EXEMPT
**MANIFEST/DOCUMENT #:** 156021A
**DATE OF DISPOSAL/RECYCLE:** SEP-01-2020

| LINE | WASTE DESCRIPTION | CONTAINERS | TYPE | QUANTITY | UOM |
|---|---|---|---|---|---|
| 1 | OILY WATER | 1 | TT | 76 | G |

I certify, on behalf of the above listed treatment facility, that to the best of my knowledge, the above described waste was managed in compliance with all applicable laws, regulations, permits and licenses on the date listed above.

**PREPARED BY:** Jared W Gillian

**SIGNATURE:** Jared W Gillian **DATE:** 09/01/2020

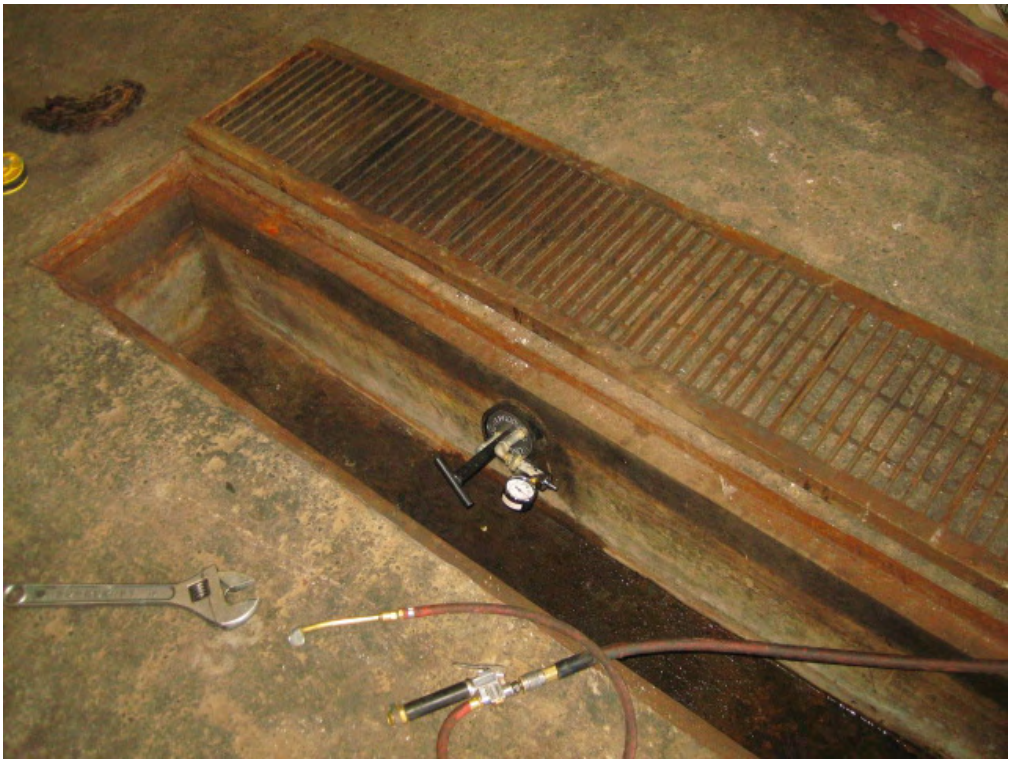

Photo 1: Pressure testing of piping between floor sump and oil/water separator tank

Photo 2: Beginning to excavate oil/water separator tank

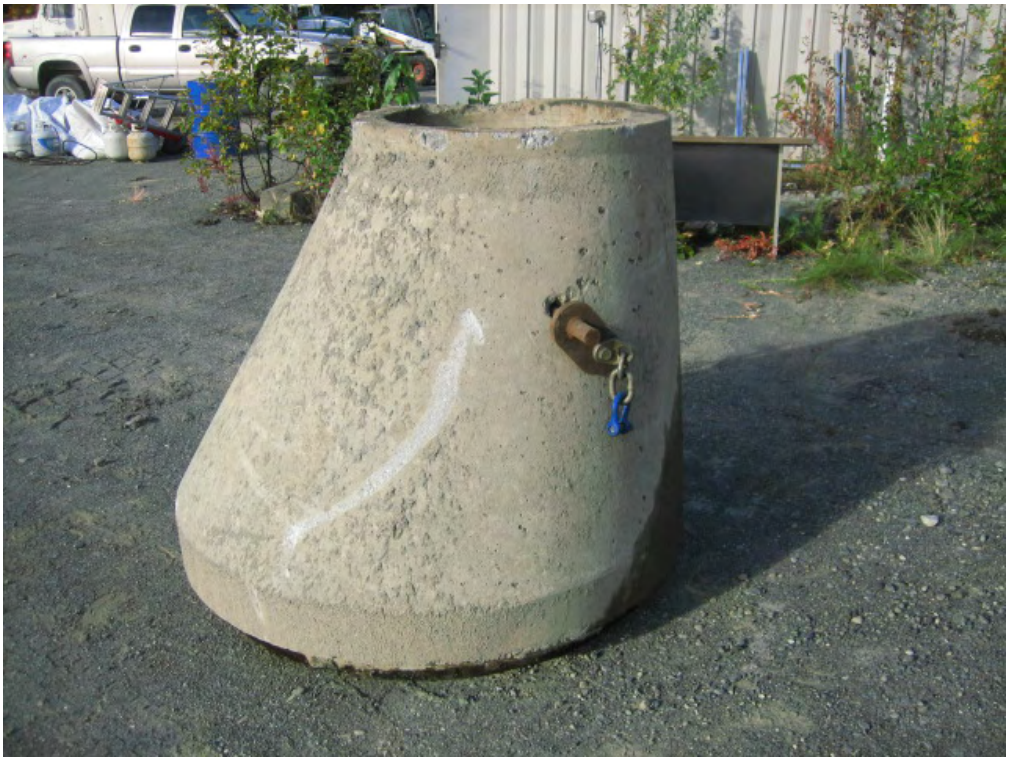

Photo 3: Top section of oil/water separator tank removed

Photo 4: Preparing to excavate base section of oil/water separator tank

Photo 5: Lifting out base section of oil/water separator tank

Photo 6: Base section of oil/water separator tank removed. Red and black staining on exterior below outlet invert for approximately ¼ of tank circumference.

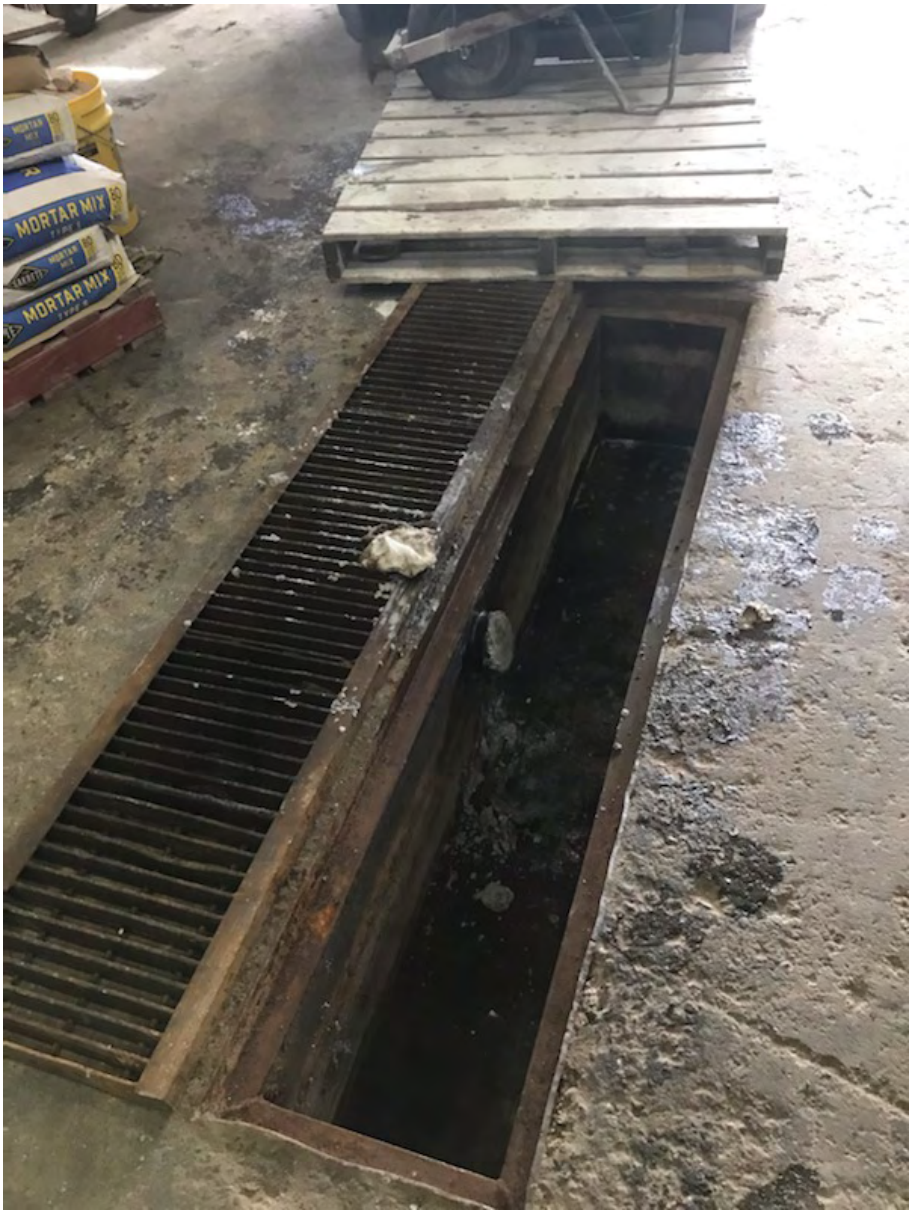


Photo 7: Bentonite slurry was pumped to completely fill piping between floor sump and oil/water separator's previous location (this photo shows piping exiting sump full of bentonite)

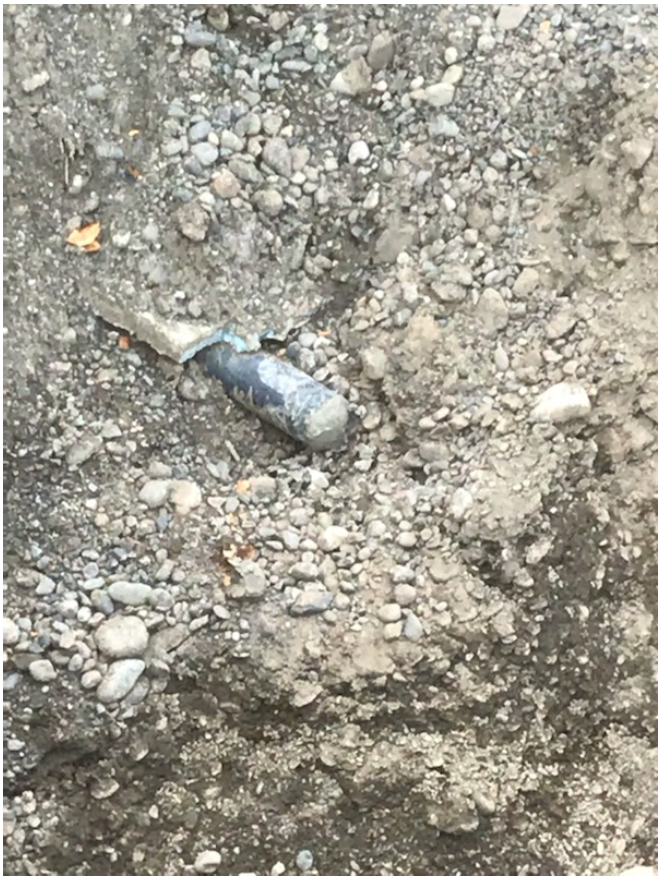

Photo 8: Bentonite slurry was pumped to completely fill piping between floor sump and oil/water separator's previous location (this photo shows exterior end of piping full of bentonite)

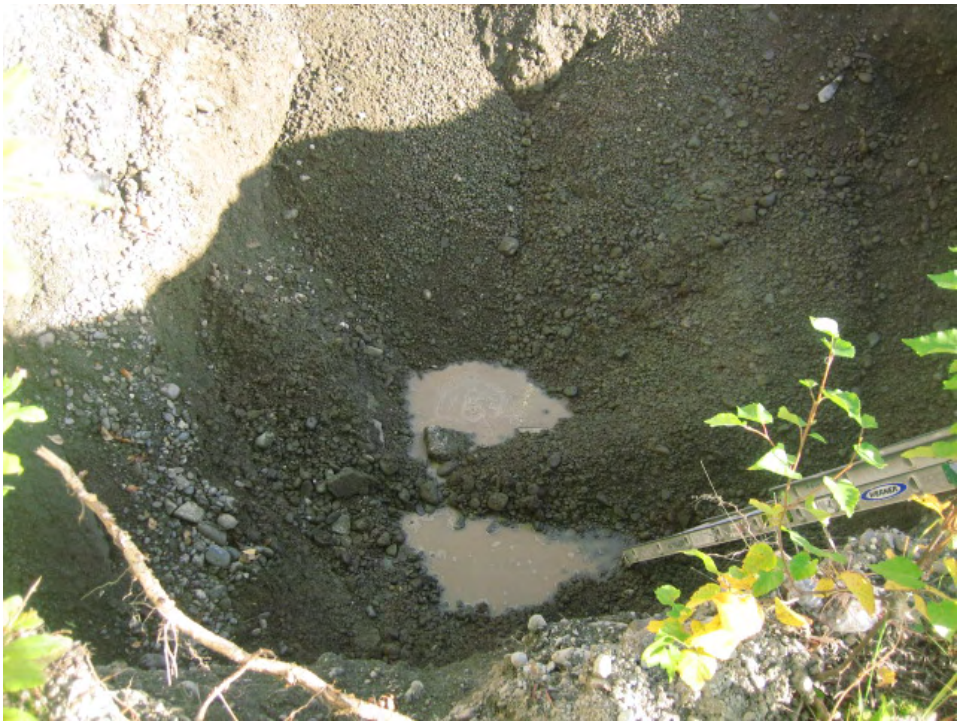

Photo 9: Groundwater observed at approximately 10' below grade

Photo 10: Excavating leachfield, looking north. Monitor Well #1 remains; Monitor Well #2 was removed and decommissioned.

Photo 11: Groundwater observed at approximately 10’ below grade. Note undermining of concrete pad near upper right hand corner of photo.

Photo 12: Excavating leachfield, looking south