

Site Characterization Update: Chilkoot Lumber Company



Prepared for:



Specialized Metal Recycling

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7/11/2000

Introduction: This report was authored by Chilkat Environmental for Specialized Metal Recycling regarding the Chilkoot Lumber Company property in Haines, AK. The current intended use of the property includes recycling of the mill during summer of 2008 for future industrial uses by the site owner. The lumber mill was originally built in 1968 by local entrepreneur John Schnabel and reached a capacity of 300,000 board feet per day. The site includes a 600 foot dock, extensive mill infrastructure and a 5 megawatt thermal power plant that operated on wood waste.

Purpose: The purpose of this report is to provide timely reporting to maintain compliance with all applicable state and federal environmental regulations during the demolition of the site which is expected to be complete by August 15. To accomplish this we will summarize our progress and current activities.

Investigators: This document was prepared by Chilkat Environmental of Haines, Alaska. Investigators include Principal Investigator Elijah Donat MS. PMP, Environmental Scientist, William Prisciandaro BS and Jacklynn Ruggirello BS Environmental Scientist.

Executive Summary:

This report will characterize the current status of the site. This includes discussion and photos to encourage an open and informed dialogue with EPA and ADEC regulatory staff regarding known environmental and human health concerns. Please contact Principal Investigator, Elijah Donat with Chilkat Environmental at (907) 766-3897 or on cell at (907) 303-7899.



Transformer Management

Non – Detect

Transformer	PCB Level*	S/N	Weight Pounds	Capacity Gallons	Disposal Method	Status	Notes	Location
515	ND	1685723	200?	10?	1			Transformer pad
517	ND	3115002	500?	30?	1			Transformer pad
None	<10	3263053	1000?	40?	1	sample	Waiting for results	Shed near bunkhouse
None	<10	3263054	1000?	40?	1	sample	Waiting for results	Shed near bunkhouse
None	<10	3263450	1000?	40?	1	sample	Waiting for results	Shed near bunkhouse

De-Contaminate for Recycling On Site

Transformer	PCB Level*	S/N	Weight Pounds	Capacity Gallons	Disposal Method	Status		
501	9	B315921	15700	820	2	drained	Removed from overhang	Concrete pad adjacent to powerhouse
502	12	No Plate	15700	820	2	drained	Removed from overhang	Concrete pad adjacent to powerhouse
504	18	66234	4175	116	2	drained	Removed from overhang	Concrete pad adjacent to powerhouse
505	28	66233	4175	116	2	drained	Removed from overhang	Concrete pad adjacent to powerhouse
506	6	66235	4175	116	2	drained	Removed from overhang	Concrete pad adjacent to powerhouse
526	4	16500	6050	235	2			Transformer pad
528	8	16501	6050	235	2			Transformer pad

Drain and ship

Transformer	PCB Level	S/N	Weight Pounds	Capacity Gallons	Disposal Method	Status		
518	591 SC	8036912	2100	72	3			Hot trailer
519	612	7525101	2100	72	3			Hot trailer
527	261	16499	6050	235	3			Transformer pad
None	510	7525100	2100	72	3	sample	Waiting for results	Hot trailer
503	63	B315920	15700	820	2	drained		Concrete pad adjacent to powerhouse
529	218	B768244	850?	35?	2			Transformer pad



Recycled

Transformer	PCB Level*	S/N	Weight Pounds	Capacity Gallons	Disposal Method	Status	Notes
507	ND	1505012	3500?	100	±	recycled	
508	ND	1505013	3500?	100	±	recycled	
509	ND	1505011	3500?	100	±	recycled	
510	ND	F241075	1045	40?	±	recycled	
511	ND	F243513	1045	40?	±	recycled	
512	ND	F243512	1045	40?	±	recycled	
523	ND	1507260	3500?	100	±	recycled	
524	ND	1505014	3500?	100	±	recycled	
525	ND	1507259	3500?	100	±	recycled	
422***	<2				Returned to AP&T	Gone	AP&T took it

720 gallons of non-detect dielectric oil and 9 transformers recycled as of 7/10/2008



Draining of Remaining Transformers

Chilkat Environmental plans to drain all remaining transformers by 7-18-08. The dielectric oil will be stored in new or reconditioned drums and sorted by <50 ppm, 50 to 500 ppm and >500 ppm. All containers will be properly labeled. Chilkat Environmental plans to ship all PCB containing dielectric oil 1ppm or higher. All transformers above 50 ppm will be properly contained and shipped to an approved facility. Those above 1ppm and below 50 will be rinsed 3 times with 10% of their volume in #1 diesel and inverted for 15 hours before being scrapped for metal recycling. Used solvent will be stored in 55 gallon drums and analyzed to determine if they are below 2ppm PCB by SW846 Method 8082. Solvent above 2 ppm will be shipped to an approved facility. Solvent below 2 ppm will be used by SMR to power equipment.

Temporary storage of PCB containing Dielectric Fluid

Two trailers are being used currently to store the fluids we have drained. Trailer #1 contains 38 drums of <50ppm fluid. Trailer #2 includes 14 drums of >50ppm as well as 3 PCB transformers and a tote of PCB contaminated soil. See photos #1 and #2 respectively. Photo #3 below demonstrates removal of the last of 6 transformers from the powerhouse overhang. Photos # 4 through #6 illustrate transformer drainage technique to eliminate spillage.



Photo 1: Trailer #1 includes Dielectric Fluid <50 ppm 38 drums and 1 overpack with gasoline contaminated at 5.87 ppm





Photo 2: Trailer #2 includes 14 drums of 68ppm, 3 PCB transformers and one tote of PCB contaminated soil



Photo #3: Removal of the last of 6 transformers from the powerhouse overhang. Transformers were drained in place before removal





Photo #4: Redundant valve and leak proof drainage system with new high quality plumbing



Photo #5: Redundant valves and leak proof drainage for 820 gallon transformers and expansion tank





Photo #6: Transformer drainage system and containment berm. Tertiary valve at drum, secondary valve at transformer and first valve on transformer.



Precipitator Ash

Precipitator ash has been suspected of containing Dioxin and RCRA metals. Ash beneath the precipitator was collected and added to the trailer containing the remainder of the material to permit recycling of the precipitator which was found to not contain ash.



Photo #7: Containment of precipitator ash



Photo #8: Precipitator ash



Contaminated Soil

ADEC identified contaminated soil at the generator building, along the south wall of the powerhouse shop and in the unlined containment area for two 5000 gallon tanks. One tank has already been drained and removed. Contaminated soil will be easier accessed after the metal recycling project.



Photo #9: Tank containment area

Hazardous Materials

Hazardous materials are stored in and adjacent to trailer #3. Materials will be discussed by category.

Asbestos – approximately 300 pounds of non-friable asbestos has been double bagged, palletized and shrink wrapped. Analyses for concrete board received 7-10-08 discovered 15% asbestos. This will also be double bagged, palletized and shrink wrapped. See Photo #11.



Photo #10: Asbestos





Photo #11 Asbestos concrete board

Lab Chemicals – Laboratory Chemical were removed from the powerhouse lab and placed upright stacked with one layer on the bottom of 5 gallon buckets and sealed. There are 7 buckets total. One is stored on another pallet labeled caustic. Lab chemicals are likely not compatible for storage together and must be properly managed and stored.



Photo #12: Lab Chemicals



Caustic Chemicals – Caustic products are stored in 5 and 7 gallon buckets. These high alkaline products were used for raise the pH of boiler water.



Photo #13: Caustic Chemicals

Contaminated Soil – Heavily contaminated organic soil was shoveled off the concrete floor of the powerhouse shop, generator shed and switch room. Soil was contained in two fish totes.



Photo #14: Contaminated Soil



Overpacks – 36 overpacks are stored in and around trailer #3. This includes;

- 3 drums of Xylene (poor drums containing new product)
- 16 drums of overpacked 55 gallon drums (containing oil based paint in failing drums)
- 1 overpack full of 1 gallon containers of liquid oil based paint
- 6 overpacks of suspected NP-1 wood preservative (The drums were severely deteriorated. To reduce personnel risk drums were pumped with a drum pump into new drums. 3 overpacks include the new drums containing the fluid. 3 overpacks include the deteriorated drums with under 2 gallons of fluid each.),
- 1 overpack of Exxon Type 3 Heavy grease lubricant. (drum is failing but product is new)
- 8 overpacks of Sodium Hydroxide (pH ranging from 11 to 14. Product used to alkalinize boiler water)
- 1 overpack with PCB contaminated solid waste



Photo #15: Overpack Trailer from entrance



Photo #16: Overpack Trailer from center





Photo #17: Overpack overflow adjacent to Overpack trailer

Former Dip Tank

The dip tank was used to preserve wood by submerging sawn lumber in NP-1 wood preservative manufactured by Kop-Coat. The tank has been flushing with rainwater for at least 17 years since it was last used. However, due to its past use, ADEC has requested the estimated 2000 gallons of tank water be pumped through a carbon filter before discharge. Chilkat Environmental will filter out the water as soon as possible to use the containment for improved safety of transformer draining which is planned to occur by 7-18-08.



Photo #18: Dip Tank includes orange metal structure and concrete containment. Drained gear boxes are in the foreground destined for recycling



Equipment remaining to drain for Recycling of metal and non-hazardous oil by 7-18-08

- Log loader
- Log Yarder
- Grader
- Car
- Dump truck
- Approximately 12 gear boxes and 6 hydraulic units
- Forklift
- 3 large gear boxes and wood chip blower above road
- Drum of waste diesel at bunkhouse
- 3 to 5 non-detect transformers
- Underground storage tank above ground with fluid near bunkhouse

6000 gallons of used oil has already been removed from the site by Chilkat Environmental and received by Bigfoot Auto for use in their waste oil burner. This includes 575 gallons of used oil pumped from a UST beneath the generator room. Approximately 300 gallons of anti-freeze, most of it contaminated with oil has been removed from the site and received by Bigfoot Auto for recycling.



Photo #19: Some of the equipment left to drain on concrete pad



Lima Crane Removed from Tideland

Chilkat Environmental was able to get the crane running for SMR to remove the boom and swing the counter weight away from the ocean to prevent loss of containment. Removal of the crane was very successful with no loss of fluids or debris.



Photo # 20: "Going"



Photo # 20: "Going"





Photo # 22: "Gone"

