



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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January 17, 2018

Esther Ashton, Tribal Administrator
Wrangell Cooperative Association
P.O. Box 2021
Wrangell, AK 99929

RE: Follow-up questions about the Wrangell Monofill Project

Dear Ms. Ashton:

Thank you for your follow-up email of January 5, 2018, requesting additional detail related to the proposed monofill. I have included your questions with our responses below.

- 1. The DEC response stated that “on a less frequent basis such as quarterly or annually” they would perform ground water monitoring for total lead. Every three months and once a year are two very different time frames. What are the deciding factors in determining when and how often ground water samples will be monitored for total lead?**

We typically like to see at least a year of quarterly monitoring to establish whether there are any seasonal variations due to groundwater elevations, volume, etc., as these factors can have an impact on contamination concentration. Once that is established, and results appear consistent when compared to the results collected during the hydrologic and leachability study conducted in the fall of 2016, the frequency may be reduced. But the frequency depends upon a review and analysis of the results. This will be a transparent process. The results will be provided to the public and WCA IGAP staff are invited to join us on inspections and monitoring events as well as to review and discuss the data.

- 2. At what date will this process be finalized?**

The frequency of groundwater monitoring will be determined once the monofill is constructed, but will be modified based on observations over time, so the periodicity of the monitoring regime is subject change and will not be finalized.

3. What is the funding source to provide for this monitoring?

The funding for this monitoring will be state funds out of DEC's budget.

4. Is the funding source guaranteed?

Funding for DEC and all of state government is subject to the annual legislative budget process, even if the funding is from another source, such as a federal grant. Therefore funding is only guaranteed on a year-by-year basis.

5. What is the cleanup plan if the measures and practices to prevent contamination during hauling material fail? For example, what would the cleanup plan be if a dump truck of Ecobonded, lead contaminated soil were to enter Pat's Lake or the surrounding areas?

If an accident of this nature were to occur, the spill would be reported to DEC and the cleanup response would happen immediately. NRC is one of the state's leading response action contractors. Their team is drilled and trained continuously to respond to scenarios such as this. Please see the details in the attached NRC Transportation Spill Response Plan.

6. Additional Question:

The City and Borough of Wrangell running track beside the elementary school was considered as an option for the monofill location. Were any plans developed for this area?

The running track (closed woodwaste fill) option was suggested by DEC and its contractors at a special meeting with the City and Borough Assembly on May 2, 2016. The site was a potential candidate largely because of its size, which would allow the treated material from the Junkyard to only be piled to perhaps two feet in depth, not including additional cover material of another two feet for the cap. However, no plans were developed for the running track option because the Assembly members rejected this site due to its proximity (adjacent) to the school, concerns about the long-term stability of the lead in the soil, and maintenance and monitoring requirements they would be responsible for as the location is on City land.



What are the ADEC requirements for monofill construction on a flat surface?

The requirements for monofill construction on a flat surface are similar to the requirements for the proposed rock pit location.

Would this be capped like the current design?

Yes, the cap design would likely be very similar to the one currently proposed.

Would it be contained and lined on the sides/bottom?

Although no design was developed for this site, a monofill at this location will need containment along the sides and if constructed without an impermeable liner would have a permeable liner along the bottom. These design elements depend upon the results of a leachability and hydrologic study that would need to be conducted for this location.

Please don't hesitate to contact me at (907) 465-5076 if you have any additional questions or need more information.

Sincerely,



Sally Schlichting
Unit Manager

Enclosure

cc: Lisa Von Barga, Borough Manager, City and Borough of Wrangell
John Halverson, Contaminated Sites Program Manager



TRANSPORTATION SPILL RESPONSE PLAN

Revised August 2017

INTRODUCTION

NRC provides waste management services to a variety of customers in the states of Alaska, Washington, Oregon, California, New York, Maine, Massachusetts, Texas and Vermont. Included in these services is transportation of a variety of hazardous wastes from the point of generation to recycling or final disposal. The wastes managed by NRC may be in bulk and non-bulk form, and hazards may include, but are not limited to, corrosive, flammable, oxidizer, or non-regulated. The following outlines the emergency equipment that is available on all NRC trucks hauling wastes. It also outlines measures NRC personnel will take in the event of a spill and any associated emergencies which may occur during transportation. Additional information regarding NRC procedures, including injury reporting and other incident response, is available in the NRC Safety Management System.

POLICY

It is the policy of NRC to report any spills outside of facility property immediately to designated NRC spill response personnel (Emergency Coordinators or ECs). The designated ECs are responsible for directing spill clean-up activities. The EC is also responsible for notifying NRC regulatory personnel of the spill. Regulatory personnel will ensure any necessary notification to appropriate regulatory agencies is made in a timely manner. A follow-up meeting among the involved employee, the supervisor, and regulatory personnel is required following each spill to discuss the cause of the spill as well as corrective action to prevent spills in the future.

CONTAINMENT AND SPILL CLEAN-UP EQUIPMENT

All NRC Alaska trucks are equipped with the following supplies for spill clean-up, containment, and emergency response:

- Fire extinguisher
- Absorbent pads
- Absorbent, such as floor dry or kitty litter
- Shovel
- Plastic bags
- Spill boom
- Level D PPE for driver
- Cellular phone

NRC Alaska also has a variety of equipment available. These include:

- Eight 80-barrel vacuum truck
- Two front end loaders
- Two Excavators
- Two Sidedumps

- Seven ISO tankers
- Four Spill response trailers
- Two Marine spill response boats
- Nine Assorted pumps and vacuum hose

SPILL CLEAN-UP PROCEDURES

Driver:

1. Shut down and exit vehicle. Keep shipping documents, the emergency response guidebook, fire extinguisher, and cell phone with you.
2. At a safe distance from the spill, evaluate the situation to determine risk.
3. Call 911 immediately if necessary, then restrict access to the area until emergency response personnel arrive.
4. If it is safe to approach the source of the spill, use the fire extinguisher to extinguish any small fires, stop any leaks or overpack any leaking drums, then stabilize the area. Use the following measures as appropriate:
 - Restrict access to spill area.
 - Place booms around spill area if volume cannot be absorbed by absorbent pads or material.
 - Place absorbent pads or absorbent material on smaller volumes of spilled liquid.
 - Dig a drainage trench if necessary to contain spilled material.
 - Once liquid is absorbed, scoop up absorbent material with a shovel, then place material and/or absorbent pads in a plastic bag or drum.Contact the EC when finished stabilizing the area.

In an event a truck rolls or goes into a water way NRC Alaska would respond as follows:

- Follow steps 1-4 and in addition
- Remove the wrecked truck from the water way.
- Excavator and lined dump truck will be brought to spill site.
- Excavator will excavate contaminated area into the lined dump truck, material will be then hauled to the mono fill site for final disposal.
- Nortech will be at spill site utilizing the XRF meter to ensure all lead contaminated material is removed.
- Confirmation soil and water samples will be taken and sent to a state approved laboratory.
- Local clean material will be used to backfill excavated area restoring it to original grade and revegetating the area affected if necessary.

5. If it is not obvious what the source of the spill is, yet calling 911 does not seem necessary, remain clear of the spill area, restrict access to the spill area, and contact the EC immediately.
6. Provide the following information to the EC:
 - Type and approximate quantity of chemical spilled
 - Location, date, and time of spill
 - Clean-up measures in process or concluded
 - Bill-of-lading/shipping paper information
 - Injuries, if any
 - Public health and environmental impact
7. Continue with clean-up as directed by EC.
8. Remain at the scene until the incident is declared “over,” by the EC and/or local emergency response personnel.

Emergency Coordinator:

1. Once contacted regarding a spill, determine if additional clean-up measures are necessary. If necessary, direct driver to perform clean-up as outlined in the emergency response guidebook, secure delivery of additional clean-up equipment or personnel by NRC Alaska, or contact other Emergency Response Agencies for assistance.
2. Contact Environmental Staff to ensure any necessary notifications are made to regulatory agencies and Qualified Individuals. Provide all information which was communicated by driver as well as additional clean-up instructions which have been provided.
3. Once the spill is sufficiently cleaned, and Environmental Staff have all necessary information regarding the incident, declare the incident “over,” and release driver to continue with transportation of the load.

Environmental Staff:

1. Contact regulatory agencies as necessary based on type and quantity of spilled material.
2. If spill clean-up effort has involved any non-NRC personnel, contact a Qualified Individual and notify them of the spill and other specific information as requested.
3. Ensure any further action requested by regulatory agencies or Qualified Individuals is accomplished within the necessary timelines.

Emergency Notification Call List

Notification to supervisory personnel must be done as soon as safely possible. The responsible party is to contact their respective Emergency Coordinator and the Emergency Coordinator is to contact at least one member of the Environmental Staff.

EMERGENCY COORDINATORS:

| Name | Contact | Capability |
|--|--|---|
| Shane O'Neill | Cell: 907-980-0818 | NRC Alaska Superintendent, Projects Qualified Individual |
| Zachary Hamilton | Office: 646-5085 Cell: 907-952-4400 | NRC Alaska Dispatcher Qualified Individual |
| Ian Combs | Office: 907-646-5089 Cell: 907-322-7108 | NRC Alaska Field Superintendent |
| Marc Palmisano | Office: 907-646-5094 Cell: 907-748-7105 | NRC Alaska Health & Safety Manager Qualified Individual |
| Rick Reimer | Office: 907-646-5083 Cell: 907-748-7106 | NRC Alaska Director, Regulatory Compliance Qualified Individual |
| Blake Hillis | Office: 907-761-6651 Cell: 907-748-7101 | NRC Alaska Senior Vice President Qualified Individual |
| Alaska Dept. of Environmental Conservation (ADEC) | | Regulatory oversight for spills on lands. |
| Anchorage | 907-269-7548 | |
| On Duty Officer (Cellular) | 907-244-8126 | |
| Kenai | 907-262-5210 | |
| Valdez | 907-835-3037 | |
| AK Dept. of Fish & Game (ADF&G) | | Regulatory oversight for fish and habitats. |
| Habitat & Restoration Division | 907-267-2338 | |
| Wildlife Conservation, Anch | 907-267-2335 | |
| Soldotna | 907-267-2182 | |
| | 907-262-9368 | |

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| Department of Natural Resources (DNR) Division of Land Office of History & Archaeology South Central Regional Office | 907-269-8548 907-269-8721 907-269-8552 | Permits for access to state land. Help for identifying and preserving cultural and historic resources. |
| USCG Stations Sector Anchorage | 800-478-5555 907-271-6700 | Protection of life and property at sea. coastal defense, and enforcement of customs, immigration, and navigation laws. Oversight for spill on navigable water |
| Juneau (17 th Dist_ HQ) | 907-463-2804 | |
| Kenai | 907-283-3292 | |
| Valdez | 907-406-0001 | |
| MSU Valdez Homer | 907-831-1508 907-235-5336 | |
| Environmental Protection Agency Anchorage Seattle (Region 10 HQ) | 907-271-5083 206-553-1263 | Regulatory oversight for spills on land. |
| National Marine Fisheries | 907-271-5006 | Regulatory oversight for marine mammals. |
| National Oceanic & Atmospheric Administration (NOAA) | 907-271-3593 | Spill Movement modeling, Weather |
| National Weather Service | 907-835-4505 | Weather reports and forecasts. |
| US Army Corps of Engineers | 907-753-2712 | Permits for wetlands. |
| US Fish & Wildlife Service | 907-271-2888 | Oversight for fish and wildlife on land. |

QUALIFIED INDIVIDUALS:

A Qualified Individual must be contacted by the Environmental Staff in the event of an extreme emergency for example: large fire, major spill, spill to surface water, major traffic accident.

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|------------------|----------------|
| Blake Hillis | (907) 748-7101 |
| Rick Reimer | (907) 748-7106 |
| Zachary Hamilton | (907) 952-4400 |
| Ian Combs | (907) 322-7108 |