

SOIL TRANSPORT AND DISPOSAL PLAN WRANGELL JUNKYARD WRANGELL, ALASKA

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Prepared for:

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1.0 SITE LOCATION

The Project Street/Location is 4 Mile Zimovia Highway, Wrangell, Alaska 99929. The legal description is Tract Y, Lot Y-2, 2.51 acres, Subdivision USS 2321, Parcel number 03-006-303. The site is located in Township 63 South; Range 38 East; Section: 7; Copper River Meridian. The Site latitude is 56.4227° N and longitude 132.3563° W. The Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) identification number for the Wrangell Junkyard site is AKSFN1002224.

2.0 SITE BACKGROUND AND PAST PROJECT ACTIVITIES

The Site history, environmental investigations and remedial actions to date are detailed in the following documents:

- Final Report for Wrangell Junkyard Preliminary Assessment; Wrangell, Alaska, NTP No. 1820121142A, February 2001. (Ecology & Environment Inc. (E&E))
- Report Wrangell Junkyard Site Characterization and Removal Cost Estimate; Wrangell, Alaska, NTP No. 1820121162, June 28, 2002. (E&E)
- Wrangell Junkyard Targeted Brownfields Assessment (TBA), Wrangell, Alaska, Technical Direction Document 13-07-0010, July 2015. (E&E).
- Final Report for 2016 Wrangell Junkyard cleanup NTP No. 18-7002-01-11, December 21, 2016 (NRC Alaska, NORTECH)

As reported in the July 2015 E&E TBA, Mr. Virgil Byford purchased the property from a private owner in the early 1960s and began salvage yard operations shortly after. Site use prior to the 1960s is unknown. Mr. Byford sold the property to Mr. Kurt Gibb in 1994. The City and Borough of Wrangell (CBW) foreclosed on the property in 2008 due to unpaid taxes. As a result of these actions, the CBW currently owns the property.

In February 2016 NRC Alaska mobilized to the Byford Junkyard site under NTP 18-7002-01-11 to start the excavation and cleanup of an estimated 4,000 cubic yards of lead contaminated soil. This material was expected to be screened down to ~2,500 cubic yards of soil after removing the larger exempt debris. The soil was then expected to be shipped off site for disposal at an EPA Permitted RCRA Subtitle C TSDF and landfill.

Once 2016 operations began onsite, it became clear that the original quantity estimate of 4,000 cubic yards was substantially lower than the actual quantity of lead contaminated soil present on site. A newly formulated estimate showed that the quantity of contaminated soil to be excavated from the site would be closer to 18,000 cubic yards. This fact resulted in a significant increase in total project cost. In order to work within available funding, NRC Alaska proposed treating the soil on site with a proven technology and stabilizing agent, EcoBond, that would reduce or eliminate the leachability of the lead. This scope of work would reduce the eventual cost of the project's transportation and disposal by re-classifying and recharacterizing the soil as non-hazardous waste under EPA's 40 CFR RCRA regulations.

Due to the limited budget available for the project, NRC Alaska was instructed by the ADEC to construct a temporary lined and covered stockpile for the stabilized treated soil. This step would fulfill the immediate need of eliminating the environmental threat to the community while allowing the ADEC to work on a permanent disposal plan. At the end of the project the total quantity of soil excavated and screened was closer to 24,000 cubic yards which produced a treated temporary

stockpile of 18,315 cubic yards to remain under cover on the upper portion of the former Byford property as illustrated in the aerial photo below.



In 2017, NRC Alaska under NTP 180000020 was asked to create an engineered monofill at the Alaska Department of Natural Resources (ADNR) Rock Pit #2 located just off Pat's Creek Road. Site prep and construction was started at the pit (see photo below) but, due to concerns raised by the citizens of Wrangell and the Wrangell Cooperative Association (WCA) the project was paused to research and address the issues and concerns raised as well as to allow more time to potentially acquire the necessary additional funding required to ship the materials off Wrangell Island.



NRC Alaska returned to Wrangell in 2018 to continue the construction of the monofill, however, the project was again put on hold while Governor Walker requested additional funding. He requested an additional five million dollars be added to the capital budget for the expressed purpose of shipping the contaminated soil to an offsite disposal facility. In May 2018, the Alaska Legislature voted to include this funding in the budget. Existing remaining funds combined with this additional funding is now sufficient to pay for packaging, shipping, and disposal of this treated material off island at an EPA permitted disposal facility.

3.0 SHIPPING AND DISPOSAL PROJECT OBJECTIVES

The primary goal of this current project is the packaging and removal of the ~18,500 cubic yards of treated lead contaminated soil as well as the disposal of the contaminated liner and cover presently used to contain the contaminated soil at the Mile 4 Junkyard site. Site restoration will be conducted once all contaminated materials have been removed from the site.

The Wrangell Lumber Mill Site owned by Silver Bay Logging, Inc., located at mile 6.2 of the Zimovia Highway, will be utilized for temporary storage for all packaged soil and subsequent barge loading for transportation to a disposal facility outside of Alaska. Details of all activities are provided later in this Plan.

4.0 STORM WATER MANAGEMENT, EROSION AND SEDIMENT CONTROL

Wrangell averages over 80 inches of precipitation per year and the former Byford Junkyard site has slopes up to 17%, which together creates the potential for erosion during site operations from run-on and precipitation. In addition, groundwater in this area is usually shallow with variable depths due to the presence of silt/glacial till that controls groundwater flow. There are small drainage channels, and an existing drainage ditch parallel transmitting drainage water to three existing culverts under the Zimovia Highway and into Zimovia Strait approximately 150 feet west of the site.

A Storm Water Pollution Prevention Plan (SWPPP) has been prepared for this project and has been previously submitted. Shane O'Neill, Project Site Superintendent for NRC Alaska is CESCL certified and will perform the weekly SWPPP inspections and event inspections. Additional details pertaining to this issue are available within the Plan.

5.0 SITE CONTROL PLAN

Vehicle access to the former Byford Junkyard site from Zimovia Highway is limited to two driveways. One is centered along the highway and will be the main entrance for truck traffic hauling containerized materials to the Silver Bay logging Mill Site. The other is a smaller driveway used by the residence directly adjacent to the work site. Barriers will be installed to reduce unauthorized access, by being placed at each driveway to block entrance to the site after work has been completed daily. No trespassing signs are currently in place and will be maintained at site entrances for the duration of the project. Truck traffic signs will be placed at both the Junkyard site and the Mill Site to communicate truck turning traffic.

At the end of each operational day, the stockpile will be covered with impermeable poly sheeting and secured. This will keep the material dry as well as limiting the chance of it being released to the environment.

Decontamination procedure will include dry sweeping wheeled vehicles prior to leaving the work area. Personnel wash stations will also be utilized for personnel to clean boots and hands prior to leaving the work area.

As part of the transportation and spill response plan, NRC Alaska will contain any and all contaminated soils inadvertently or accidentally released.

6.0 PUBLIC COMMUNICATIONS

At the start of the project a public notice will be provided to the Wrangell Sentinel, the ADEC, the local Wrangell radio station KSTK, and to the City and Borough of Wrangell (CBW). These public notices will detail the hauling schedule throughout the duration of this project.

Weekly project reports will be provided to the ADEC and CBW to update everyone concerned about the project's progress. The work schedule and anticipated barge loadout dates will also be provided with the weekly reports.

Important updates, notices, and changes to the schedule will be available on the Wrangell Community Forum on Facebook for users of this social media platform.

7.0 CONTAINERIZATION FOR TRANSPORTATION AND DISPOSAL

All contaminated materials including the treated materials in the stockpile as well as the contaminated liner that has been in contact with the contaminated soil will be containerized into specially designed and DOT certified woven fiber bags also known as Flexible Intermediate Bulk Containers (FIBC). This packaging choice will allow for the material to be shipped by Marine Carrier as a Non RCRA regulated contaminated soil, not requiring an EPA manifest. Each FIBC will be loaded to a quantity not exceeding 12 tons net weight per package. For DOT Classification purposes, the Proper Shipping Name (PSN) will be UN3077 Environmentally Hazardous Substance, Solid N.O.S. (Lead) 9 PGIII ERG171. This PSN will be utilized on all of the proper labeling, marking, and placarding of each container as well, in full compliance with US DOT 49CFR Hazardous Material Shipping regulations.

8.0 PERSONNEL

A crew of 11 individuals will be working the site, 7 from NRC Alaska and 4 from BW Enterprises. This number includes site supervision, shipping paper preparation, waste tracking, transportation coordination, site safety oversight, equipment operators, and laborers needed fill each FIBC. NORTECH will have up to two people on site for sampling at the two sites periodically throughout the project.

Title	Name	Organization, Telephone
Contract Manager	Blake Hillis	NRC Alaska, (907) 646-5082
Contracting Officer	Procurement Manager	ADEC, (907) 465-5076
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NRC Alaska Supporting Director & Quality Assurance Manager	Rick Reimer	NRC Alaska, (907) 646-5083
Safety Officer	Marc Palmisano	NRC Alaska, (907) 646-5094
Qualified Environmental Professional	Jason Ginter, PMP	<i>NORTECH</i> , (907) 586-6813
	Ronald Pratt	or Cell (360) 236-8865
Equipment Operator	Brett Woodbury	BW Enterprises, (907) 874-2190

9.0 EQUIPMENT

Equipment utilized on site during this project include; track excavators, wheel loaders with forks and lifting racks, small track bulldozer, loader mounted brush sweeper for housekeeping, semi-tractor truck units to facilitate FIBC movements, and crane to facilitate barge loading.

Additional equipment used periodically throughout the project will include a barge, tug, train and gondola cars.



10.0 SITE OPERATIONS

Work on site is estimated to take up to 17 weeks to complete, working uninterrupted 6 days per week packaging 20-25 FIBC's per day. Approximately every 4-6 weeks, a barge load of filled FIBC's will be shipped from the Silver Bay mill site storage area in Wrangell to Seattle.



Once all contaminated materials have been containerized and removed from the site. The area under the current stockpile will be sampled to ensure it is free from contamination and then the site will be leveled and closed.

11.0 BYFORD JUNKYARD SITE PREPARATION

A flat operation pad, approx. 130' x 150' will be constructed directly to the southeast of the current stockpile on the Byford Junkyard site. The loading area of the pad will be lined with a portion of the material used to cover the stockpile to ensure that no contamination is spread while the contaminated soil is loaded into the 9-yard FIBC's. The loading area will be made so that a tent can be erected if weather becomes a hindrance to the project schedule.



After the operations/FIBC loading pad is completed, a driving surface will be made by capping a driving lane connecting the operation pad to the main site entrance with D1 to facilitate truck traffic on site. This D1 gravel capped driving lane is necessary to avoid damaging truck tires.

12.0 MILL SITE PREPARATION

At the Silver Bay logging Mill site, the concrete pad and driving paths will be swept using a powered sweeper attachment on a loader. The surrounding areas will then be sampled for lead. This will be repeated at the end of the project to confirm that our activities on site were clean and did not result in contamination.

The dirt path/road that connects the paved driving area to the concrete pad and barge ramp will be rocked with 6"- shot rock hauled from the monofill site and then capped with D1 gravel to make a smooth and mud free driving surface for the truck hauling and barge loading.



13.0 CONTAINERIZING SOIL

A small area at the southeast corner of the stockpile will be cut open. Directly adjacent to the opened stockpile, on the lined loading area, two "loading boxes" will be placed. Each loading box holds one 9-yard FIBC. The FIBC will be opened and placed inside and secured to the rack by two NRC ALASKA laborers. Approximately 9 yards of contaminated soil from the stockpile will be loaded into each FIBC using an excavator. The FIBC's will then have both the inner and outer flaps closed and secured. The straps for the bags will then be attached to the "moving frame" attached to a 160 loader (lifting capacity per manufacturer is 34,000 lbs.).

Once the bags are free from the loading box they will be inspected by NRC Alaska laborers. Any contaminated material found to be on the outside of the FIBC it will be cleaned while still on the lined pad. Extreme care will be taken to prevent the release of any of the packaged treated soil at this site. Once the FIBC passes inspection it will be loaded onto a 20' flatbed trailer and secured. Each bag will be numbered, labeled and manifested individually before being transported from site.

The FIBC will then be moved from the Junkyard site to the Mill site by a tractor trailer driven by a local driver. Once at the Mill site the FIBC will be unloaded using the same method-- a loader with a lifting rack. Weights will be checked periodically to ensure proper loading of the bags to maximize packaging and minimize over loading. The FIBC will be placed on a concrete or paved pad near the barge ramp/dock.

14.0 BARGE LOADOUT

Upon an accumulation of up to 10,000 tons of packaged materials (~800 ea. approximately 9 cubic yard capacity FIBC's), the filled containers will then be loaded by crane and or loader onto the deck of a barge. Each loadout is expected to take 3 days. Due to congestion at the Silver Bay logging mill site, work at the former Junkyard site will be suspended during barge loadouts.

Once loaded, the barge will make the voyage to the Duwamish waterway area of the Port of Seattle. This is estimated to be approximately every six weeks. The project will be completed with a total of three loadouts performed by the following marine carrier:

HEKO SERVICES INC
WAD988470589
2130 HARBOR AVE SW
SEATTLE, WA 98126



15.0 BARGE UNLOADING AND TSDF DELIVERY

From the Waste Management Duwamish Transfer Facility in Seattle, the FIBC's will be offloaded from the barge deck and transferred to gondola style railcars. Seven to eight bags will be placed into each gondola car. The tracks at the Duwamish Transfer Facility connect to Union Pacific railroad's Argo Yard for switching and connection to the dedicated unit train that the UPRR operates to the South of Arlington in Oregon. This daily train is used for delivery of municipal solid waste from the greater Seattle area to the Waste Management Columbia Ridge Landfill and Recycling facility.

COLUMBIA RIDGE LANDFILL & RECYCLING CENTER
ORD987173457
18177 CEDAR SPRINGS LN
ARLINGTON, OR 97812



When the train arrives in the rail yard at the Columbia Ridge Landfill, the FIBC's will be off-loaded from the gondola style railcars and sent by truck to the active landfill face for tipping and depositing into the landfill. This entire sequence will be tracked, recorded, reported and performed using acceptable shipping papers from start to finish.

This FIBC containerized method represents a very safe and secure method of movement for this volume of material as well as providing the least amount of risk for shipping off site.



16.0 SITE CLOSURE

NRC Alaska and NORTECH will submit a Site Restoration Plan no later than 30 days before completion of the removal of contamination from the Junkyard site for ADEC review.

17.0 SAMPLING CONFIRMATION

NORTECH will complete confirmation sampling to ensure that no contaminated materials are present under the current stockpile location or at the loading pad.

18.0 SITE RESTORATION

After confirmation that the all contaminated material has been removed from the site and ADEC approval, NRC Alaska will recontour the stockpile area by removing and repositioning the berms used to contain the stockpile. The site will be left to facilitate proper drainage of surface water to comply with SWPPP closure. The site will be left smooth with no holes or safety issues.

Site restoration is estimated to take less than one week to complete to the satisfaction of the ADEC and the site's owner, the CBW. This will be performed with consideration for the surrounding neighbors on adjacent lots to the former Junkyard site. As previously stated, it is our intention to leave the site in far better condition than we found it.

19.0 MILL SITE CLOSURE

When the last of the containerized contaminated soil is removed from the mill site, the containment pad and the driving route will be swept again using a loader with a power brush attachment. NORTECH will perform confirmation sampling to ensure that no contaminated material escaped the packages and that the site is returned to the property owner in the same or better condition than when we arrived.

20.0 FINAL REPORTING

At the end of this project a final report will be completed and submitted to the ADEC containing a detailed description of activities on site, copies of all manifests used for transportation of the contaminated materials, copies of disposal certs from the final TSDF, and analytical confirming that the junkyard site is clean of contamination.