

Kathryn Walukewicz

I strongly request a denial for Soil Treatment Technologies, LLC to conduct thermal soil remediation in Nikiski. To begin, the requirement for notifying the public, i.e. Nikiski residents, of the intentions of STT to conduct business in a residential area of Nikiski was completely evaded. It states in the Department of Environmental Conservation for the state of Alaska, page 140 under Procedures that include a public comment period (which section 7 of STT's Stationary Source Identification Form ascertains), that "the department will provide 30 days for the public to submit comments; the department will give notice using the Alaska Online Public Notice System; will use other means necessary for informing the public." I searched the Alaska Online Public Notice System for Kenai and Anchorage and there was nothing posted regarding the submission of STT's Stationary Source Identification Form (application). I also did not find any article, literature, flyers or radio broadcast through the Kenai Peninsula Borough that advised residents of Kenai or Nikiski regarding the "town meeting" held on July 14, or the intentions of STT conducting business in the residential area instead of the industrial area of Nikiski. I found the so-called public notice only on the ADEC Division of Air Quality's webpage, and only knew to look there after a Nikiski resident informed me of the company's name and intention to conduct thermal soil remediation. The lack of appropriate and responsible public notification is grounds for an immediate denial or at minimum an appropriate delay until the residents/public have ample opportunity (the actual 30 days after authentic notification) to investigate and discuss this type of business in our community.

In addition, STT's Stationary Source Identification Form does not address the following concerns:

- Transportation of contaminated soil: where is it coming from, how is it getting to Nikiski, is the contaminated soil on a vehicle or vessel, is it covered at all times, and what is it covered with, will truck commuting result in delays on the Kenai Spur Highway?
- Conveyor at site to transfer contaminated soil from building to thermal heating unit: is the conveyor covered, what is covered by, and what is the length/distance in which the contaminated soil is on a conveyor?
- Bagging and Bag House: how is the toxic waste/particulates gathered and disposed of, and how often?
- Treated soil will be stockpiled onsite and covered with temporary liner covers until tested: is the soil piled on a concrete slab (thus not to penetrate original site soil), what are the size(s) and numbers of the stockpiles, what is the material of the liner covers (i.e. plastic, mesh etc.), do the liners prohibit rain infiltration and runoff, how often are the stockpiles tested, where will the successful soil remain stored and in what manner (i.e. container, stockpile, removed from site)?
- Treated soil has the potential of being 1% contaminated: how does that percentage affect organic ground soil, water tables, wildlife, wetlands, and residents in 1-5 years of operation?
- Who has the regulatory authority to conduct air, soil, and water testing? Who has the authority to cease operation in inclement weather? What specifically does STT define as inclement weather? How will rain affect the stockpiles of treated soil?
- Water for cooling treated soil and dust control: where is the water runoff collected, stored or treated? Most importantly, where and how is the water that is used for contaminated soil dust control being collected?
- How will snow affect the soil stockpiles and unheated holding structure for contaminated soil? Will ALL soil be removed from the site prior to freezing temperatures and/or snow fall?
- Why isn't this operation being conducted in the Nikiski Industrial area, where it would be more

appropriate, instead of a highly populated residential area?

-Will the site be fenced off to prevent intrusion of wildlife, curious persons, recreational motor equipment (i.e. ATV, dirt bikes, etc.), for the unintentional distribution of contaminated soil and dust?

Until these questions are answered and the majority of Nikiski residents have an appropriate time to deliberate the true nature and intention of STT's operation, I feel it needs to be denied. The Nikiski community DOES support local and new businesses, but not a business that immediately appears to skate around informing the public of their intentions, disregard for providing/publishing thorough layman term information, and the potential to generate harm to human health, wildlife, and established businesses in an area we call home.

In closing, I would like to reiterate the area in which STT would be conducting toxic soil remediation is in a highly concentrated residential area, within 2 miles of wetlands, a fish processing plant, school(s), public shopping domain, and would have a significant [negative] impact to the main thoroughfare of Nikiski residents. I am a proud resident of Nikiski, a military veteran, a mother, and an employee of a local Nikiski business, and I am respectfully requesting a denial of STT's application for operation in the residential area of Nikiski.

Thank you for your time and consideration on this matter.

Kathryn Walukewicz