

In reference to:

AQ1657MSS01 Soil Treatment Technologies LLC, Soil Remediation Unit

I am opposed to the following decision:

The Alaska Department of Environmental Conservation (ADEC) has made a preliminary decision to issue Air Quality Control Minor Permit AQ1657MSS01 to Soil Treatment Technologies, LLC (STT) for a Soil Remediation Unit in Nikiski.

I am familiar with these types of thermal systems. I was contracted to be a site-inspector during much of the early clean-up at the former Chevron Refinery site remediation. A thermal burning system was used for some of this clean-up work. When it operated perfectly as designed, the exhaust air quality was within DEC limits. However, any operational upset would allow dust with toxic qualities to spew forth which would then be spread by the wind from the thermal unit.

The Thermal burning unit was located on-site at the former Chevron tank field which had no immediate neighbors. The consequences of the dust pollution were that an extended clean-up was required.

Locating the proposed Soil Treatment Technologies, LLC in the present Nikiski location would have severe consequences if there were an air quality excursion. This is an area with a seafood processing plant, residential neighbors, a Jr/Sr High School, and the Nikiski town business area which are all within reach of toxic dust contamination.

In the Air Quality Control Minor Permit AQ1657MSS01 the Alaska DEC has stated specific guidelines for air quality. Do these guidelines incorporate residential and seafood processing, schools, and business areas as neighbors to the proposed thermal remediation plant?

I do not believe there has been adequate analysis completed with consideration to the probably toxic dust excursions that can occur and the consequences of reoccurring toxic dust excursions during the Thermal burner operation.

With consideration to air quality and the seafood processing, residential neighbors, school and businesses in the vicinity and extended area, how often will the air quality be monitored?

I would propose this should be done on all four compass quadrants on a continuous basis anytime the plant is running with a shut-off protocol in the event of "any air quality excursion".

There should be arbitrary wind limits specified in the permit so that extremely fine dust from the thermal burner cannot be carried beyond their property line boundaries, otherwise the Soil Remediation Unit will be polluting the immediate and extended area. This will reduce other owner's property values and potentially will result in lawsuits due to property damage. The State of Alaska DEC would also be a party to the responsibility for having issued a faulty-skewed air quality permit.

I believe the best solution would be to "deny the permit" for AQ1657MSS01 Soil Treatment Technologies LLC, Soil Remediation Unit and have them move to a more remote location away from the possibility of a severe wind day and a thermal operation upset that would allow toxic dust to spew over the seafood processor, residential locations, Nikiski Jr/Sr High School, and into the Nikiski business area.