

To: Alaska Department of Environmental Conservation

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Submitted by: Peter E. McKay, 55441 Chinook Rd. Kenai AK 99611, mckayped@yahoo.com

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Subject: Public Comments to the Alaska Department of Environmental Conservation (ADEC) regarding the preliminary decision to issue Air Quality Control Minor Permit AQ1657MSS01 to Soil Treatment Technologies, LLC (STT) for a Soil Remediation Unit in Nikiski.

I have several concerns about the proposal to issue an Air Quality Permit and operate a Soil Remediation Unit in Nikiski.

The application does not specify what the substance(s) are that have contaminated the soils – that require remediation. It does specify that many tons of hazardous waste are proposed to be released into the air in our community. It is important to inform the public whether the remediation is to remove hydrocarbons, oilfield waste, radioactive waste etc. I would also expect that the efficiency of the Soil Remediation Unit (SRU) would vary depending on what is being mitigated/removed. The description of the contaminated soils and the removal efficiency information should be included in the permit application.

The waste stream, prior to its arrival at the SRU should be considered and environmental effects mitigated. This includes the transportation of the contaminated soil. If the contaminated soils are to be trucked to the facility – where do the soils originate? What is the route of transport? Will the loads be covered? How will the contaminated soils be transferred from the truck to the covered facility? Will the transportation of contaminated soils impact the Nikiski residents who use the Kenai Spur Highway?

Permit Appl. Addendum 4 on Page 3 states that the nearest distance from emission outlet to Residence of 500' and other occupied (commercial) structure at 400'. The SRU is to be located on three Gagnon Acres Subdivision Lots No. 1 (2.89 acres), Lot No. 2 (2.12 acres) and Lot No. 3 (2.12 acres). It is not known where the SRU will be placed on the three lots. I did not find a plot map that shows where the covered facility and SRU will be located and what the truck route through the facility, and what the dump locations will be. The emission outlet(s) must be identified. It is impossible to verify the claimed distances between the SRU (and other hazardous waste handling locations) and residential dwellings or other buildings. The lots where the SRU facility is to be located is directly bordered on the North by the Kenai Spur Highway. Many people traveling on the highway would be potentially exposed to SRU emissions or hazardous waste as they travel the highway and could be further exposed in the event there is a process upset at the SRU facility or loss of the incinerator function. Several residential dwellings are directly across the Spur Highway from the Soil Treatment Technologies lots and would often be directly downwind of the facility. In addition to health concerns, these homeowners would likely find their home/property values decreased.

I found no evidence that this proposed hazardous waste facility would prevent unauthorized entry. I'm fairly certain there is currently no fence around these gravel pits. There is nothing to prevent kids on ATV's or wildlife from entering the area. This must be addressed.

Groundwater contamination. There must be a rigorous testing program to establish the current state of area groundwater in many locations on and around the three lots. The commercial facilities and the residential dwellings should have all water wells/water systems sampled as a base line and on a repeated cycle.

I believe that ADEC must deny the permit until these and other concerns are satisfactorily addressed.

Thank you for considering my opinions.

Pete