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1.0 Introduction

Is the company really going to be able to run this machine efficiently? They have never run this machine before; they just bought it. With all the issues and problems that we have been commenting on, I really worry about peoples' health, and the environment, and the safety issues.

2. The facility diagram in the operations plan does not show how many houses or wells that are really around the area of the property in question. There are not just two, like it shows, but 10 houses, 1 clammy, and 11 wells, one of which is food grade, in a 500' radius. The building is not set on an angle. Don Rappe's well next door, or the clammy's well, next door the other way, have not been tested. With the groundwater flow direction marked on this diagram, the groundwater and any contaminates in or around it would flow right into the clammy's well.

3. Post-Treatment sampling. There should be a liner underneath their facility. A liner should be under the machine, and another liner under the contaminants. I would say that the public has a right to see pictures of what has been done building this facility.

4. The building sets is actually straight, parallel to the property line. The set back is wrong. The building is not completely enclosed. This facility does not have any retaining walls. It has huge cement blocks, that weigh 4000 - 5000 lbs each. If they are stacked on the asphalt, it will break. The plan says the asphalt is 2" thick. To haul dumptrucks at around 39,000 lbs; and belly dumps at around 79,000 lbs; I don't think the 2" of asphalt is going to hold up. So with all the blocks and the seams, how are they going to seal this from all the rainwater, wash water, etc.?

Where they have drilled the well at the facility, there is water that sits in that whole area in the spring. It sits close to the clammy's well water aquifer. The DEC has not even come to look at the facility, or the neighborhood it is in. They are going off of aerial photos, which are old. Has the DEC even been here since they started this project? The drains, the compaction, the inches in asphalt, the start up to finish of this operation. Where are the photos? Where are the engineer's drawings?

5. Engineering plans. The community, and I, would like to see the engineering plans for this operation. There needs to be a second containment pit liner under the contamination building. There needs to be a pit liner underneath the dirt burner itself, for a second containment so nothing gets into the water table. The engineering plan says that this machine is under a cover. Is there actually going to be a pit liner under the material already burnt, when they stockpile it?

6. Site monitor procedures. When they come out with the 5 ton permit, it just had hydrocarbons. Now they need, on all 4 corners of the property, they need air and emission monitors and a camera on the exhaust, for the community to review. They also need monitoring wells on all 4 corners of the property, because they are dumping so much water in the area. They need to be monitored probably twice a week. There needs to be a chain-link fence around the facility to prevent kids and animals from getting in the area.

1.1 Site description: Don Rappe's place is NW from the facility. South is towards town. Someone needs to take a yardage gun and a gps and measure all this stuff the right way, instead of guesstimating and using outdated aerial photos. There are 10 houses and 11 wells right by the facility. The facility itself is in a 22' - 30' deep hole. They show only 2 water wells only 500' by the facility. That is not correct.

2.0 Financial Responsibilities.

1.1 This facility should insure everything that is in the 500' perimeter boundary. They need an

insurance policy to protect every person in this boundary, the houses, properties. The vehicular traffic. The pedestrians going by. All this should be insured, in case there is a breach in operations. Fire, health, safety, explosions. Fire or explosions due to the bag house. They should have coverage in case something does happen. They should also have an environmental impact insurance coverage for this area. Talking to Kathy at DEC, the bag units have a tendency to catch on fire or explode. Will our neighborhood be covered by insurance, from the company, for this?

3.0 Air pollution control systems.

They need air monitors, emission monitors, and dust control monitors.

3.1 Overview: Greater than 2" to be washed with power washer. How are you going to deal with any garbage, plastics, chunks of wood; that come into the site unawares?

3.2 Solid waste & process streams. Is the water from this just going to drip all over the ground? Is a pit liner going to be under the process stream?

3.2.1 Washing the material with the pressure washer: what happens to the material that you get, by mistake, that is soaked with contaminants? How can that be treated? What is your plan to take care of this stuff?

The water used to wash the contaminated stuff should be taken to injection wells that the oil companies own. Dust and vapors are going to be very bad in this 500' perimeter boundary, where people live.

3.2.4 The building's ends are both open. The water spray will be going in and out from the pressure washer, rain, wind. The catch basin is setting right where all the water comes down off the quanset hut, thus more contamination if it overfills. On the basin: it is set in the ground. What if the drains break from frost, earthquake, etc.? What happens when we get rain downpours like we do? Can you keep up with the overflow? What is your plan for that? The treatment water, infiltrating into the ground, 100' from the well. Anywhere you dump that in the yard, is only 60' from the well, not 100'. When they discharge this water, they plan to test it, but then they plan to look for oil sheens, and smell the odor, then use absorbant pads to catch the excess oil on the ground. This I find maddening. There is no way anybody is going to keep the water in the property boundaries (480,000 gallons of water).

3.2.3, 3.2.4 In this process of what they are talking about, the machine is only as good as its operators. In this operation, they speak of dust, vapors, noise, fumes, loaded trucks. What time are they going to be working? How many employees? Two shifts? How are the workers going to deal with the complicated sounding start up and shut down processes? Will they be too tired at the end of their shifts to deal with the procedures coheritantly? They say they are going to work 12 hours a day, 6 days a week. The foot traffic for that time period for the dumptrucks is going to be maddening. I worry about the family with the little kids playing in the front yards, within the 500' area of the processing plant. They will get hit with all the dust and odors from the dumptrucks alone. You look at the hours they want to run, and the days a week. It will be statewide, hauling dirt from all over Alaska. This is NOT an industrial area!

3.5 Air pollution control: When they started with the air permit, they said they were only going to do 5 tons an hour, and only hydrocarbons. Now its up to 25 tons an hour, along with hydrocarbons, doc's and other materials. What are we actually looking at for the emissions? That is why we need 4 monitors set up around the site, to protect the people. I think all this stuff here needs to be considered for this residential area. It's not about zoning, its about common sense. I also think there needs to be another party to do all the monitoring so STT can be held accountable for mistakes.

4.4.1 I would like to have public comment on all the pictures that the professional engineer has done on this site.

4.4.3 This is what is scary: at 230 miles away from Anchorage, DEC has yet to come down to look at the property and situation. The DEC needs to be on the project from start to finish.

4.5.2 Cover. Is there going to be there 24/7 to watch the tarps, etc. when we have bad rain, wind storms, etc.? On the general maintenance, they really need to enforce the monitors 24/7. This way if they are gone, the emissions or whatever are being watched.

4.8 Ground water monitoring. Instead of testing peoples' wells, they need to have four monitoring wells on each corner of the property. They should test the said wells every two weeks. They are dropping 480,000 gallons of water on the surface.

Samples: the number of soil samples needs to be a lot more than the company plans to do, considering how much soil is going to be burned. Its' in a residential area. This company, and the DEC, need to go up and above what they are currently doing for this. One small sample for 10 yards of dirt? Are you kidding me???

The company would not have to do all this stuff in an industrial area.

I am going to say it again. This gravel pit is all used up. The 20-30' difference in the elevation, for a water buffer, is way too close. When you actually dump that much water in an area where it is 60' from the water table, it is way too close to discharge the water on the surface.

Also why are they using cheap filters? They need to buy the good ones instead of going cheaper. This operation is going to affect everyone around here. It really needs to be looked at a lot better; even reconsidered.

10 House
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 11 wells
 In South

The unit is on
 the north side
 A Angle bot
 picture
 straight

~~fast track~~



well
 Don Rappers has
 not been tested
 North
 South

Joe Ross has
 been tested

		<p>FIGURE 2 Site Map</p>
<p>8361 PETERSBURG STREET ANCHORAGE, ALASKA 99507 907-677-7423</p>	<p>DATE: August 4, 2021 REV: 2 CHKD: DRAWN: NJB PROJ NO.: 03-000</p>	<p>Facility Property Boundary 500 Feet Perimeter Boundary Private Water Supply Well *Well Locations Based on WELTS Database On-Site Water Supply Well</p> <p>Feet 0 250</p>