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The site description in the operations plan (Section 1.1) is disingenuous and misleading. It states, "The property is bordered by the Kenai Spur Highway to the north, vacant lot to the south, and commercial properties to the east and west."

- First, there is no such thing as "commercial" property in Nikiski, as Nikiski has no zoning designated as commercial.

- Second, the lot immediately east of the property houses a residence in the upper floor (the lower floor is no longer an operating business). The second floor looks directly down on STT's operations on the side nearest the burner.

- Third, the idea that the property is "bordered" on the north by the Kenai Spur Highway is misleading, as the highway imposes no barrier whatsoever to exhaust and noise emissions, and there are several residences directly across from the STT facility. The wording in the operations plan appears designed to avoid admitting that they located in a residential area, but the fact is that they did so. Homeowners are rightly concerned about the concentration of exhaust gases coming from the facility so near them, especially when air monitoring is so lax.

During the original submission for this facility, I expressed doubts about the overhead structure being sound or effective, given weather conditions in Nikiski. Sure enough, the shelter caved in over the winter. I reported this to the DEC; did the owner report it before I did? The DEC never acknowledged my email that reported this. The roof caved in on top of many sacks of soil that I assume were contaminated, as they were stored where contaminated soil was designated to be stored. How were those handled in order to prevent contaminant spread? Did any bags break or tear? The people who reside in this area are kept unaware about any details of such dealings, and I'm not even sure the DEC is aware of how these things were handled.

After the roof caved in, the operator was allowed to continue operations. The overhead structure was an integral part of the original operations plan, and based on the premise that STT would need to follow their operating plan verbatim, I believed that operations would either include this structure or be shut down until a new operating plan was established. However, the DEC apparently allowed STT to continue operations without the overhead structure and without a new operating plan approved. This was an improper approach, and the DEC violated the public trust in allowing operations to continue without adhering to the original operations plan.

Now STT is proposing that they be allowed to use a reinforced plastic cover, only 6 mil thick, over the contaminated soil. Are we all so naïve to believe that Nikiski winds will have no effect on that? And in the winter a 20 mil "shutdown liner" is to cover the containment cell? If high winds took out a Quonset-type shelter, it's hard to believe they won't affect a 20 mil "liner" that is basically a large tarp. Will the public need to monitor the failure of this item for you the same way we monitored the failure of the Quonset-like hood?

I oppose any increase in storage capacity on the basis that this will lead to future increases in exhaust gas output. The DEC seems to rubber-stamp everything proposed by this operator. The more STT processes, the more money they make. Increases in contaminated exhaust gases seem likely to follow. Since the DEC appears to allow exceptions regarding this facility without further public input, allowing them to carry on without meeting the promises made in their original

operating plan, how can we trust the DEC's oversight of this facility?

Nathan Oberlee told me, before this facility started up, that he would not be taking wet materials. Yet reports locally indicate that the facility has indeed accepted wet materials. If they have already accepted wet materials, how can we know they are actually aware of what is being unloaded at their site? The reporting on this site should be open to the public, so we can be assured of proper oversight of the facility and its operations. How can we be sure they won't process non-petroleum chemicals?

Noise pollution continues to be a concern with the facility. Unlike gravel pits, this type of facility does not go through any public comment period having to do with actual pit operations. However, there is little difference between this type of operation and a gravel pit. Back-up alarms, rock screening, conveying of materials, heavy equipment and truck movements are all virtually identical to gravel pit operations. The facility should have been subjected to the same procedures imposed on gravel pits, at the very least, before operations began. STT's operating plan says it will monitor dB emissions for the first 30 days, and will only continue to monitor dB emissions if they exceed 85 dB. However, the CDC indicates that by 70 dB, persistent noise is "annoying" and by 80 dB, it is "very annoying" and hearing damage is possible. The EPA calculated the safe noise level for the public to prevent hearing loss to be a 70-decibel time-weighted average for a 24-hour period (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5308171/>). Therefore, STT should not only be measuring peak dB, but should calculate average dB over a 24 hour period, and this monitoring should continue as long as the average dB is more than 70 dB. As noted by the NIH, the EPA didn't account for lifetime noise exposure; therefore, "the real average safe noise level to prevent hearing loss is probably lower. Noise also has nonauditory health impacts—increases in stress hormones, hypertension, obesity, cardiac disease, and mortality—at average daily exposures of only 55 decibels, with activity interference beginning at 45 decibels."

This facility should never have been located in a residential area. While I don't oppose the location of such a facility in an industrial area of Nikiski (and there is indeed an acknowledged industrial area but they chose not to locate there), I continue to oppose the location of this facility in a residential area and I question the ability or likelihood of DEC in Juneau to properly monitor this facility on any regular basis. Much of the operations plan is based on self-reporting, and that is a bit like the fox guarding the henhouse. To protect the public, particularly nearby residences who will have greater concentrations of exhaust gases, air monitors should be placed at the lot corners and air quality should continually be monitored and reported.