

CITY OF UNALASKA

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Via Certified Mail – Return Receipt Requested

January 31, 2017

Alaska Department of Environmental Conservation
Contaminated Sites Program
Attn: Kim DeRuyter
555 Cordova Street
Anchorage, AK 99501

Re: City of Unalaska – Storm Drainage Projects - Ilulaa Lake/East Point Road

Dear Ms. DeRuyter:

The attached document presents a waste management work plan addendum for City of Unalaska storm drain improvements near the Rocky Point Management Area and the Pre-WWII Tank Farm area in Dutch Harbor, Alaska.

The City of Unalaska previously completed the storm drain work on Delta Way but left out East Point Road due to concerns with groundwater and budget. This document is intended to round out the planning requirements to finish the work on East Point Road in 2017. It is essentially identical to the waste management plan used for Delta Way.

If you have any questions or concerns regarding this matter, please contact me at 907-581-1260.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Lund".

Robert Lund, P.E.
City Engineer

Attached (1)



Waste Management Work Plan Addendum II for Ilulak Lake/East Point Road

Prepared by

**City of Unalaska
Department of Public Works
PO Box 610
Unalaska, Alaska 99685**

Prepared for

**Ilulak Lake / East Point Road & Delta Way
Drainage Improvements
DPW Project No. 10101
Dutch Harbor, Alaska**

January 31, 2017

Prepared By



Robert Lund, P.E.



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Attachment B	Email from Chevron/Stantec Regarding Gauging Monitoring Wells
Attachment C	ADEC Email Regarding Agency Oversight of Water Disposal
Attachment D	Option #2 Water Treatment Diagram
Attachment E	ADEC Correspondence (pending ADEC review of this draft)

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LIST OF ACRONYMS

	Highlighting indicates text revisions to September 29, 2016 draft
AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
API	American Petroleum Institute
AS	Alaska Statute
BTEX	benzene, toluene, ethylbenzene, and total xylenes
CFR	Code of Federal Regulations
CoC	chain of custody
DRO	diesel range organics
EPA	Environmental Protection Agency
gal	gallon(s)
gpm	gallon(s) per minute
HAZWOPER	hazardous waste operations and emergency response
ID	identification
lbs	pounds
LDPE	low density polyethylene
mg	milligram(s)
mg/L	milligram(s) per liter
MLW	mean low water
MW	monitoring well
NAD 83	North American Datum 1983 (horizontal)
OSHA	Occupational Health & Safety Administration
PAHs	polynuclear aromatic hydrocarbons
PPE	personal protective equipment
RCRA	Resource Conservation and Recovery Act
RRO	residual range organics
SAP/QAP	sampling analysis plan quality assurance plan
TAH/TAqH	total aromatic hydrocarbons / total aqueous hydrocarbons
USACE	United States Army Corps of Engineers
US	United States
US DOT	United States Department of Transportation
WRCC	Western Region Climate Center

1.0 INTRODUCTION

The City of Unalaska (the City) has prepared this *Work Plan Addendum II* for well gauging and investigation derived waste management during storm drain improvements at the Iluluaq Lake/East Point Road (the Project) in Unalaska/Port of Dutch Harbor, Alaska.

Following the successful completion of the Delta Way portion this Project has been altered in the following manner: storm drain construction on East Point Road is being rescheduled in 2017 because the City has altered the storm drain plans to exclude areas where dewatering groundwater would be necessary. Work will proceed from Stations EP-6+10 to EP-13+36 as shown in Attachment A – Sample Location Map of the *Characterization Report*.

The City is not a responsible party for the area wide contamination and has changed plans in several instances to accommodate the financial impacts of installing a storm drain system in a contaminated location. The work has been planned in general accordance with ADEC's March 2014 Technical Memorandum entitled *Managing Petroleum-Contaminated Soil, Water, or Free Product during Public Utility and Right-of-Way Construction and Maintenance Projects*.

The following synopsis of historical reports encompasses the City's efforts to date:

February 29, 2012. City of Unalaska. *Work Plan for Iluluaq Lake/East Point Roads & Delta Way*. Unalaska, Alaska (the *Work Plan*).

The *Work Plan* describes a plan to pre-characterize soils in the right of way to determine whether portions are eligible for removal and treatment as beneficial fill during a City storm drain installation through a listed contaminated site. It also proposes conditionally using remaining contaminated soil as backfill and disposing of the remainder in a lined cell near the City Landfill. ADEC accepted the *Work Plan* with conditions in correspondence dated March 2, 2012.

September 11, 2012. City of Unalaska. *Characterization Report and Work Plan Addendum for Iluluaq Lake/East Point Road & Delta Way*. Unalaska, Alaska (the *Characterization Report*).

The *Characterization Report* describes the results of the soils characterization and presents a delineation of eligible soils. ADEC accepted the *Characterization Report* in correspondence dated September 17, 2012.

March 3, 2014. City of Unalaska. *Waste Management Work Plan Addendum for Iluluaq Lake/East Point Road & Delta Way*. Unalaska, Alaska (the *Work Plan Addendum*).

The *Work Plan Addendum* reduced the planned work area to Delta Way alone. It also notified ADEC of additional work on Delta Way adjacent to but not part of the contaminated site. The remainder of the report added work plan information for

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groundwater level gauging and waste management, including decontamination rinsate but not excavation dewatering nearly identical to this *Work Plan Addendum II*.

April 24, 2014. City of Unalaska. *City of Unalaska – Ilulaq Lake/East Point Road & Delta Way Addendum*. Unalaska, Alaska (*the Willow Drive Addition*).

The *Willow Drive Addition* added a conditional alternate lined cell location on Willow Drive. It also shows a reroute of a downstream portion of the Delta Way storm drain and conditionally allows treatment of portions of that soil as eligible for reuse as beneficial fill based on historical soil data from that location.

November 19, 2014. Travis/Peterson Environmental Consulting, Inc. *Delta Way Storm Drain and Investigation Derived Waste Management Report*, Unalaska, Alaska (*the Work Report*).

The *Delta Way Work Report* documented implementation on Delta Way in 2014 during a storm drain installation. ADEC accepted the *Delta Way Work Report* in correspondence dated February 2, 2015.

June 2, 2014. City of Unalaska. *City of Unalaska – Ilulaq Lake/East Point Road and Delta Way Compilation*. Unalaska, Alaska (*the Compilation*).

The *Compilation* was provided at ADEC's request and is a compilation of the above reports provided in electronic and hardcopy format.

2.0 SCOPE OF WORK

This document is sealed by an Alaska registered professional environmental engineer in accordance with 12 AAC 36.990 (36). The preparer of this Work Plan Addendum II is an employee of the City and a Qualified Environmental Professional and Qualified Sampler as stipulated in 18 AAC 75.990(187-188) and conditionally approved by ADEC. All work proposed in this Work Plan Addendum must be performed by or supervised by individuals meeting the criteria of Qualified Environmental Professionals and Qualified Samplers per 18 AAC 75.990(187-188). The work must be conducted in accordance with this document, and all applicable local, state, and federal laws.

As required by OSHA “Hazardous Waste Operations and Emergency Response” guidelines (29 CFR 1910.120), a site specific Health and Safety Plan will be prepared. At a minimum, the Health and Safety Plan will define the proposed activities, describe physical and chemical hazards that may be associated with the work, provide a map to the nearest emergency medical facility, and include material safety data sheets for any hazardous chemicals that will be used or produced during the work. A copy of the Health and Safety Plan will be available onsite at all times during field work. Those performing field activities will be HAZWOPER certified, review this *Work Plan Addendum II*, and review the Health and Safety Plan prior to beginning field operations.

2.1 TASK 1 – GROUNDWATER LEVEL GAUGING

In order to schedule construction at a time when groundwater levels are at their lowest, Chevron monitoring wells MW-3R, MW-15, and MWRP-16 will be gauged and surveyed (for location see **Attachment A**). In an email dated September 20, 2016 Chevron did not object to the City accessing these wells for gauging so long as proper procedures were followed and an access agreement is developed (**Attachment B**).

Based on inspection of historical ground water levels in MW-3R, MW-15 and MWRP-16, precipitation data from WRCC, the lowest groundwater elevations may be expected in June, July, and August in Dutch Harbor. To avoid dewatering, the target groundwater elevation is lower than 2-feet elevation in MLW. For reference, NAD83 Alaska State Plane Zone 10 Epoch 2012 coordinates and MLW top of casing elevations in US survey feet are approximately:

- MW-3R 5316486.46, 1189179.12, 13.80
- MW-15 5316620.14, 1189228.52, 14.30 (14.52 pre 9/2012)
- MWRP-16 5316369.82, 1189027.91, 13.87

The static water levels and/or free fuel thickness inside the wells will be measured by slowly lowering an electronic water level indicator into each well until the instrument indicates the

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groundwater surface has been encountered. The measurement must be made from the location permanently notched on the top of each casing on its north side. Measurements must be made with a device capable of 0.01 foot accuracy. Each water level measurement must be repeated to verify the accuracy of the initial measurement.

A water level or interface probe cannot be used if there is viscous oily fuel in the well. In that case, an optical measurement device or a sterile disposable string and weight system will be used to gauge the well.

Before, between wells, and after monitoring well gauging, the gauging equipment will be properly disposed of or decontaminated. The well plug and lock will be replaced and secured and the vault lid refastened with proper bolts so as to prevent surface water intrusion into the wells.

2.2 TASK 2 – INVESTIGATION DERIVED WASTE MANAGEMENT

Investigation derived waste may be generated throughout the course of the storm system installation. The goal of this *Work Plan Addendum II* is to minimize quantities, to segregate waste by apparent contamination levels, and properly recycle or dispose of those products.

The expected contaminants are hydrocarbons such as lubrication oils, bunker C, diesel, aviation fuel, and gasoline released to the environment during historical fueling activities by others.

The expected waste streams are as follows:

- Soil which will be handled as described in the *Characterization Report* Section 6.0 entitled *Work Plan Addendum*.
- Disposable equipment such as used PPE, visquene, and Sediment Filters.
- Fuel collected with oil sorbent booms and pads.
- Granular Activated Carbon.
- Decontamination rinsate including incidental rainwater captured by Containment.

2.2.1 Waste Profiling

Based on historical information, knowledge of processes, and past activities by others, the generation of hazardous waste by this project is unlikely. Free fuel encountered during decontamination activities is expected to be less than the 40 CFR 261.5 small quantity generator exemption of less than 100 kilograms per month. Information regarding handling of hazardous waste is provided so that a plan is in place in the unlikely event that lab results show it is generated.

Where appropriate, composite samples will be collected for waste profiling as hazardous or non-hazardous. Profiling analysis of solids will consist of process knowledge and/or TCLP-toxicity for

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benzene and/or laboratory analysis of RRO, DRO, GRO, BTEX, and PAHs by previously approved methods described in the *Work Plan* Attachment D SAP/QAP. Profiling of contaminated water will be based on process knowledge and/or historical analytical data by others from vicinity monitoring wells.

2.2.2 Parts and Materials Specifications

1. Approved Facility – A facility approved by the EPA and/or the State of Alaska.
2. Drum – New or reconditioned US DOT approved 55 gallon open top steel Drums.
3. Carbon Drum - A Drum type Granular Activated Carbon liquid phase adsorber vessel which is plumbed and rated by the manufacturer for this use. Acceptable manufacturers include Tigg, Siemens, Calgon, and Envirosupply.
4. Containment – A leak tight Rain4Rent SpillGuard temporary spill Containment berm or other leak tight equivalent which meets the conditions of 18 AAC 75.
5. Sediment Filter – 10 micron 30% efficiency filter sock or equivalent.
6. Granular Activated Carbon – 200-pounds of 8x30 or 12x40 virgin acid washed coconut-shell Carbon for liquid phase treatment.
7. Plastic Bags – 10 mil clear LDPE Drum liner.
8. Project Detergent – Simple Green, Citrosol, or Alconox.

2.2.3 Container Labeling During Storage

During storage, Drums used to contain waste will be labeled with Drum label stickers for “pending analysis”, “non-hazardous waste”, or as required by RCRA for hazardous materials. At a minimum the labels will be rated for outdoor use, be legible, be visible, and at a minimum contain the following information:

- Date of generation;
- Contents description;
- Site identification;
- Project contact number; and
- Name and telephone of designated or emergency contact.

2.2.4 Containment

The Containment will be located within 200 feet of the excavation and more than 100 feet from surface water. Drums of decontamination rinsate and any water treatment equipment or conveyance will be stored, operated, and maintained within Containment or suitable over pack Drums.

The soils beneath the Containment will be screened and sampled once before installation. If Containment fails hydrostatic testing before commissioning repairs will be made and retesting performed until it passes. The soils beneath Containment will be re-screened and re-sampled following decommissioning if the Containment fails final hydrostatic testing. Soil samples will be collected from a decision unit comprising the area under the Containment 0.5 to 1 foot below ground surface.

Containment hydrostatic testing will be used to determine if any decontamination rinsate can/could have penetrated and contaminated underlying soil. Hydrostatic testing will consist of a 2-hour leak integrity test in general accordance with Petroleum Equipment Institute's *Recommended Practices for the Testing and Verification of Spill, Overfill, Leak Detection and Secondary Containment Equipment at UST Facilities*. The Containment will be filled with potable water to the highest level possible during hydrostatic testing.

- If after 2-hours the water level has not dropped more than 1/8-inch the Containment passes.
- If after 2-hour the water level has dropped more than 1/8-inch the Containment fails.

Personnel will field screen soils with the PID, in accordance with Section 3.2 Field Screening, of the ADEC March 2016 *Field Sampling Guidance*. The confirmation samples will be collected in accordance with Section 3.4 and 3.5 of the ADEC March 2016 *Field Sampling Guidance* noted in **Table 1** below and the SAP/QAP Attachment D from the Work Plan.

Field screens and confirmation samples will be biased towards visual and olfactory evidence of contamination and extra confirmation samples will be collected from the location of any leaks or tears in the Containment. If no evidence is apparent, remaining sample locations will be randomly selected from a grid of at least 100 increments.

Table 1 Surface Soil Sample Collection

Surface Area (square feet)	# of Screening Samples	# of Laboratory Samples
0-50	5	2
51-124	5	3
125-250	1 per 25 sq ft	3
More than 250	10 plus 1 per additional 100 sq ft.	3 plus one sample for each additional 250 sq ft

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Confirmation and soil samples will be analyzed for GRO compounds by method AK101, BTEX by EPA method 8021B, PAHs by EPA Method 8270D, DRO by method AK102, and RRO by method AK103 as shown in **Table 2**.

Table 2 Analytical Methods and Sample Requirements

Method	Matrix	Container (jars)	Preservative/Extraction	Hold time
EPA 8021B (BTEX)	Soil	(1) 4-oz amber wide mouth jar with septa lid, shared with GRO	4 degrees C / Methanol	14 days
AK101 (GRO)	Soil	(1) 4-oz amber wide mouth jar with septa lid, shared with BTEX	4 degrees C / Methanol	14 days
AK102/AK103 (DRO/RRO)	Soil	(1) 4oz amber wide mouth jar	4 degrees C.	14 days
EPA 8270D (PAHs)	Soil	(1) 4oz amber wide mouth jar	4 degrees C.	7 days

2.2.5 Disposable Equipment

Certain disposable equipment such as PPE, oil sorbent materials, sample equipment, visquene, and Sediment Filters may be exposed to contamination and will be segregated within separate plastic bag lined Drums based on field observations of visual and/or olfactory levels of contamination such as oil stains, oily mud, and fuel odor. All Drums will be stored more than 100 feet from surface water.

Drums of used disposable equipment, lined with Plastic Bags, do not need to be stored in additional Containment as the plastic bag liner and drum system acts as a secondary containment. Drums containing materials with no visible and/or olfactory evidence of contamination will have labels annotated as “non-oily waste” and Drums containing materials exhibiting visible and/or olfactory evidence of contamination will have labels annotated with “oily waste”. Following field activities the bins and contents will be profiled as necessary, properly labeled, and disposed of at an approved waste disposal facility.

- “Non-oily waste” materials may only be disposed of at the City of Unalaska Class I Municipal Solid Waste Landfill so long as the Landfill approves the profiling and disposal under their permit with ADEC.

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- Used oil sorbent materials will be collected in “oily waste” labeled plastic bag lined Drums. The contents will be disposed by incineration with an approved safe ash burner.
- Sediment Filters may not be classified as “non-oily waste”. They may either be profiled and transported off-island at an approved waste disposal facility or disposed of by incineration in an approved safe ash burner.
- Granular Activated Carbon will be profiled as necessary and recycled off-island at an approved facility.
- All other “oily waste” materials will be properly transported to an off-island facility and disposed of at an approved facility as determined by the profiling results.

Less than 12 Drums of these materials are expected.

2.2.6 Dry Decontamination Procedures for Non-Disposable Equipment

Non-disposable equipment such as hand tools, excavator buckets, loader buckets, and others can be decontaminated using dry decontamination techniques. Dry decontamination techniques include brushing, wiping with oil sorbent pads, and wiping with other hand tools to remove visible and olfactory evidence of oil contamination. A project detergent may be used during dry decontamination so long as no free liquid is generated.

Dry decontamination will be considered complete when a clean oil sorbent pad wipe against the equipment does not pick up an oily stain.

Soils generated during dry decontamination will be collected in buckets or tarps and re-emplaced into the excavation per the *Characterization Report Section 6.0* entitled *Work Plan Addendum*.

2.2.7 Decontamination Rinsate

In certain cases wash down of contaminated equipment may be required. Two options are presented below for proper handling of decontamination rinsate.

Option #1 – Off-Island Disposal of Decontamination Rinsate

Additional decontamination may be required. In this case non-disposable equipment will be decontaminated using high pressure water and/or steam, a project detergent, and scrubbing inside Containment. Liquid generated during decontamination may be composed of free fuel, water containing dissolved fuel, or incidental rain water which falls into the Containment.

The expected volume of decontamination rinsate is less than 5,000-gallons.

- Decontamination rinsate will initially be collected inside the Containment pad and then bailed or pumped with an electric sump pump into an equilibrium vessel such as a

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Drum(s) or an API type separator. The electric sump pump will be surrounded with sorbent booms.

- Gravity separation and sorbent booms or pads will be used to collect and adsorb any free floating fuel from the top of the equilibrium vessel(s).
- Separated water will be stored in Drums or an equivalent DOT approved vessel.
- The Drums or equivalent vessel will be stored in Containment.
- Separated water will be profiled and disposed of at an approved facility.

Any rainwater which collects in the Containment and does not exhibit sheen will be discharged within the storm drain installation excavation where it will infiltrate more than 100 feet from Iliuliuk Bay. If sheen is exhibited, the rain water will be disposed of as decontamination rinsate.

Option #2 – Onsite Treatment and Disposal of Decontamination Rinsate

Additional decontamination may be required. In this case non-disposable equipment will be decontaminated using high pressure water and/or steam, a project detergent, and scrubbing inside Containment. Liquid generated during decontamination may be composed of free fuel, water containing dissolved fuel, or incidental rain water which falls into the Containment.

ADEC correspondence transferring oversight of the water aspects between ADEC Division of Water and ADEC Division of Contaminated Sites is included in **Attachment C**. A treatment system diagram is included in **Attachment D**.

The expected volume of decontamination rinsate is less than 5,000 gallons.

- Decontamination rinsate will initially be collected inside Containment and then pumped with an electric sump pump into an equilibrium vessel such as a Drum(s) or an API type separator. The electric sump pump will be surrounded with sorbent booms and encased in a Sediment Filter sock.
- Gravity separation and sorbent booms or pads will be used to collect and adsorb any free floating fuel from the top of the equilibrium vessel. No free fuel or water containing free fuel may be treated with the Granular Activated Carbon.
- Separated water will be pumped and filtered through a Sediment Filter, Granular Activated Carbon, and then discharged directly into the open project excavation. Effluent water will be discharged in such a manner that it does not run-off into surface water and soaks into the soils of the excavation itself.
- Used Granular Activated Carbon will be drained, profiled, transported, and disposed of or recycled at an approved facility.

The Granular Activated Carbon will be pre-soaked for 24 hours with potable tap water prior to use. The purpose is to settle the Carbon granules and prevent short circuiting of water i.e. treatment bypass.

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Flow through the Granular Activated Carbon Drum will be limited to manufacturer recommendations of 5 gpm per square foot of horizontal Carbon bed surface area.

The following list will be used to monitor discharge of effluent treated water in general accordance with Table 1 of ADEC General Permit AKG002000 and ADECs March 2016 *Field Sampling Guidance* Section 4. A log will be made of the following proposed conditions on a daily basis:

Treatment Equipment – The equipment used, equipment, condition, and any *Work Plan Addendum* deviations.

Discharge Point – Within storm drain installation excavation with full infiltration into the soil occurring more than 100 feet from Iliuliuk Bay.

Flow – Flow is not to exceed a rate of 5 gpm per square foot of horizontal Carbon bed and a project total of 5,000 gallons.

Sheen – Visual monitoring of effluent. Sheen is not permitted and is cause for immediate shutdown of discharge.

Turbidity – Not applicable because discharge is to infiltrate soil.

Erosion – Not applicable because discharge is to an open excavation which will later be backfilled.

A conservative estimate of Granular Activated Carbon adsorption is made below to show the adequacy of treatment by 200 pounds of Granular Activated Carbon and to justify the proposed visual monitoring plan above.

Granular Activated Carbon can adsorb about 12% of its own weight in benzene. Benzene is used in this analysis because it has solubility greater than other TAH/TAQH constituents. Higher solubility fuel constituents are more difficult to adsorb to Granular Activated Carbon than lower solubility fuel constituents because they are more hydrophilic.

The estimate is based on a concentration of 100 mg/L of benzene which is 20,000 times higher than ADEC cleanup levels.

1. If the concentration of benzene was about 100 mg/L the quantity of water contaminated with benzene that can be filtered with 200 pounds of Granular Activated Carbon is about 28,757 gallons. I.e. $100 \text{ mg/L} \times 2.205 \times 10^6 \text{ lbs/mg} \times 3.785 \text{ L/gal} \times 28,757 \text{ gal} = 12\% \text{ of } 200 \text{ lbs.}$

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The Granular Activated Carbon (200 pounds) may treat 28,757 gallons. The case is conservative and the project treatment volume is less than 20% of the estimate at 5,000 gallons.

2.2.8 Offsite Shipping

Hazardous or non-hazardous wastes or recyclable materials will be transported in accordance with industry standards and state and federal regulations.

Applicable regulations include, but are not limited to the following:

- Resource Conservation and Recovery Act: 40 CFR Parts 260, 261, 262, 263, 268, and 279.
- Toxic Substances Control Act: 40 CFR Part 761.
- Hazardous Materials Transportation Act: 49 CFR Part: 171-179.
- Alaska Statutes and Regulations: AS 46.03, Environmental Conservation.
- 18 AAC 60, Solid Waste Management.
- 18 AAC 62, Hazardous Waste.

Prior to offsite disposal of any waste, an approval package for each waste stream being shipped will be prepared. This package will include a waste profile naming the City as the generator of the waste, analytical summary table(s) applicable to the waste, land disposal restriction notification for any hazardous wastes, a completed waste manifest (when possible), and any other applicable information necessary for a responsible person at the City to complete review of the disposal package and sign as the generator.

The signed profile will then be submitted to the designated offsite facility operator for acceptance and approval. Once the approval letter is received from the designated facility operator, transportation can be scheduled. RCRA hazardous wastes must be transported using a uniform hazardous waste manifest and must be manifested separately from non-RCRA wastes. Where allowed by law, some non-hazardous wastes can be shipped on a bill-of-lading only.

Wastes (hazardous or non-hazardous) that cannot be recycled or otherwise used will be manifested to an approved treatment, storage, and disposal facility. An approved facility notification/certification is required for hazardous wastes. This form also requires the City's responsible person's signature and submission to the designated facility.

2.2.9 Shipping Manifests

Hazardous and non-hazardous materials, substances, or wastes identified for handling and removal from the site will be packaged, labeled, marked, and manifested according to applicable state and federal regulations (40 CFR 263). The City will sign the manifest after verifying its accuracy and completeness. The original generator copy of the hazardous waste manifest, signed by transporters and the approved facility, and certificates of disposal, destruction, and/or treatment will be provided to the City.

The manifest form will also include the following information:

- Transporter information including name, address, contact name and the telephone number, and EPA ID number.
- Designated facility information including name, address, telephone number, and EPA ID number.
- Site name including street and mailing address (if different).
- DOT proper shipping name.
- Type and number of containers.
- Quantity of waste (volumetric estimate).
- Profile reference number.
- 24-hour emergency phone number.

The City will be responsible for the following:

- Obtaining necessary profiles.
- Preparing exception reports when required by 40 CFR 262.42 and 40 CFR 761.215.
- Preparing Land Disposal Restriction Notification forms (required for hazardous waste).
- Confirming that the waste (both hazardous and non-hazardous) is ultimately disposed of at the designated facility.

Hazardous and non-hazardous wastes will be manifested separately. The City will provide ADEC a copy of the manifest within the time limit specified by 18 AAC 60 and 62.

The City and the transporter must sign the manifest prior to the load of waste leaving the site. The original signed manifest will be returned to the City.

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If a signed hazardous waste manifest from the designated facility is not received within 35 days, the City must contact the transporter or the designated facility to determine the status of the waste. If the signed hazardous waste manifest has not been received within 45 days, the City must issue an exception report to the State of Alaska, as required under 40 CFR 262.42.

2.2.10 Transportation

A contractor licensed for commercial transportation will transport non-hazardous wastes. If wastes are hazardous, the transporter will have an EPA identification number, and will comply with transportation requirements outlined in 49 CFR 171-179 (DOT) and 40 CFR 263.11 and 263.31 (Hazardous Waste Transportation). Weights will be recorded on the waste manifest as necessary.

3.0 RECORDKEEPING

The following records and documents will be maintained and included in follow-up reporting:

- Decontamination rinsate treatment records.
- Waste summary and inspection records.
- Photolog.
- Onsite treatment and disposal of decontamination rinsate logs.
- Field sampling forms, logs, CoC documentation and laboratory reports.
- Transportation and offsite disposal documentation, including the following:
 1. Transportation logs.
 2. Copies of the profiles and associated characterization data.
 3. The transporter signed manifest as well as the fully executed manifests.
 4. Designated offsite facility waste receipts and/or certificates of disposal or destruction.

Follow-up reporting will be in accordance with ADECs 2009 *Site Characterization Work Plan and Reporting Guidance for Investigation of Contaminated Sites*.

4.0 CONCLUSIONS & RECOMMENDATIONS

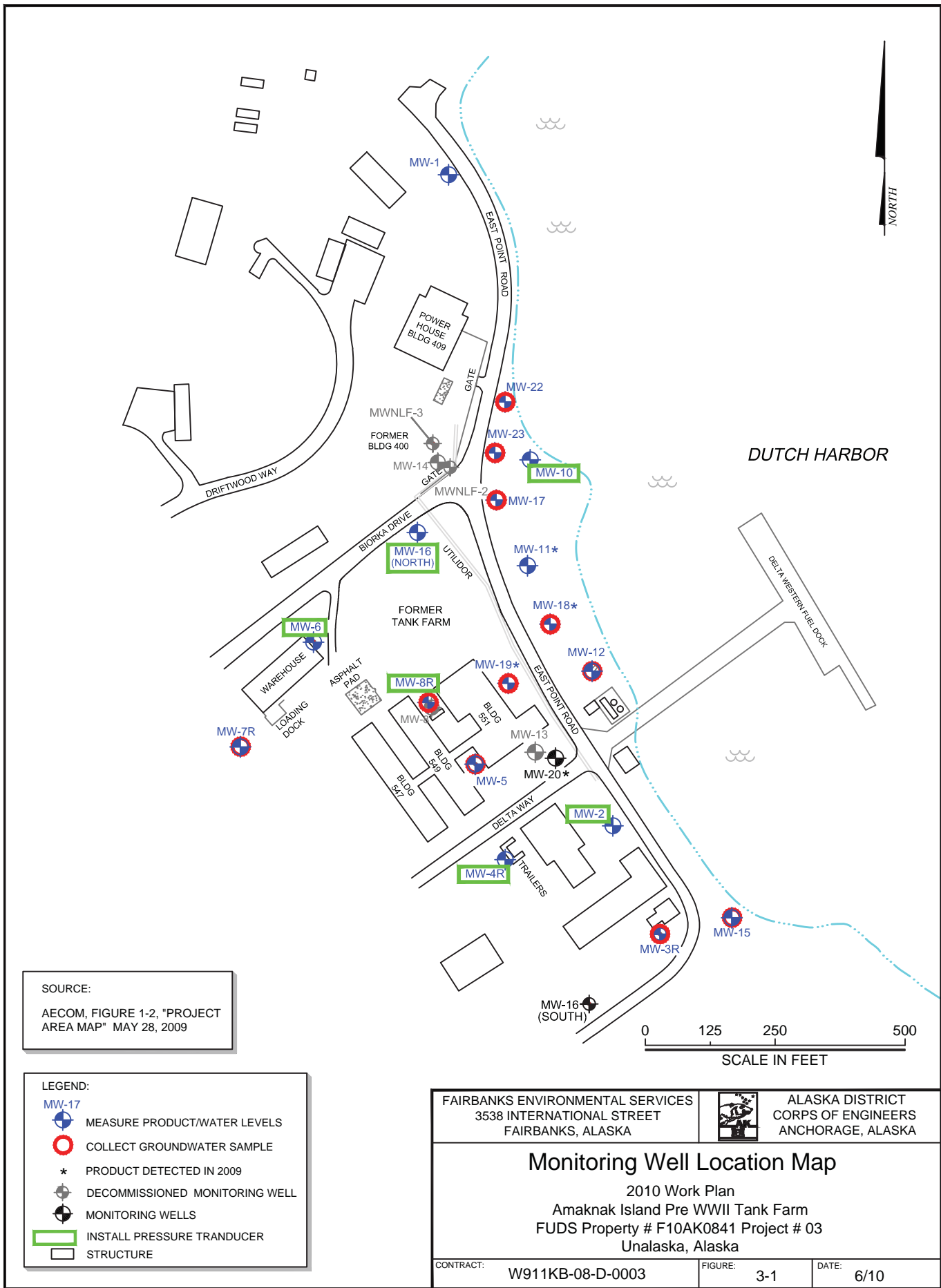
Following completion of this project record keeping documents and the results of the Containment soil characterization will be submitted to ADEC along with the follow-up reporting that was required in the *Work Plan* Section 5.10 Data Analysis and Reporting.

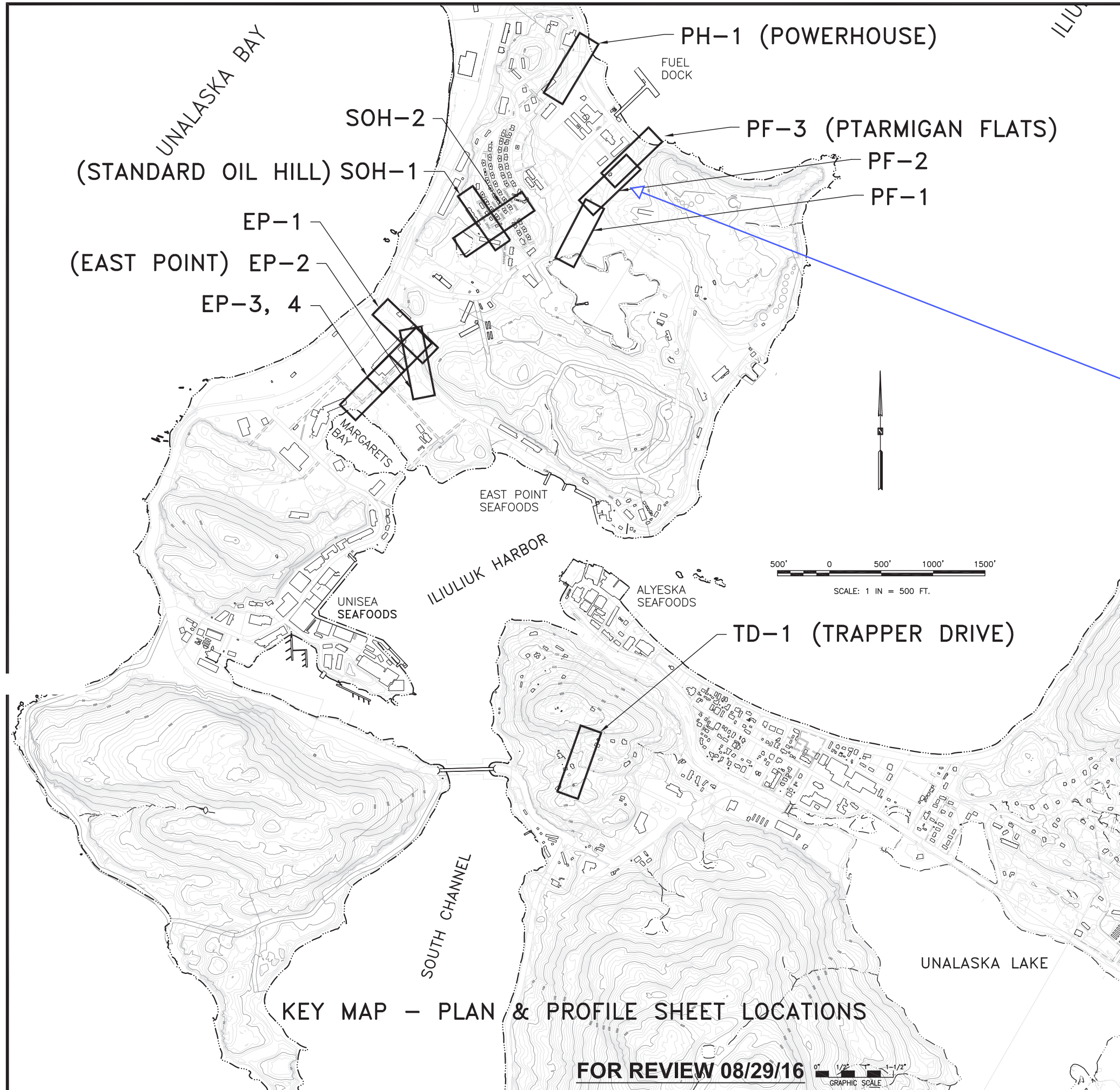
The City requests ADEC's consideration and review of this *Work Plan Addendum II*. **Attachment E** includes agency review.

5.0 REFERENCES

- Chevron 2009. Stantec Consulting Corporation for Chevron Environmental Management Company. *Annual Area Wide Groundwater Monitoring and Operations & Maintenance Report – 2009*. Rocky Point Management Area, Dutch Harbor, Unalaska Alaska.
- City 2012. City of Unalaska. *2012 Characterization Report and Work Plan Addendum for Iluluaq Lake/East Point Road & Delta Way*. Unalaska, Alaska.
- City 2012. City of Unalaska. *Work Plan for Iluluaq Lake/East Point Roads & Delta Way*. Unalaska, Alaska.
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- Regan 2016. Regan Engineering for the City of Unalaska. *2016 City of Unalaska Drainage Projects Iluluaq Lake / East Point Road & Delta Way DPW Project No. 1010*. Unalaska, Dutch Harbor, Alaska.
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- USACE 2009. AECOM Technical Services for USACE, 2009. *FINAL 2009 Groundwater Monitoring Program Report, Amaknak Pre-WWII Tank Farm Contract No. W911KB-08-D-0004 Task Order 0007 FUDS Property No. F10AK084103*.
- USACE 2013. Fairbanks Environmental Services. *Final Groundwater Monitoring Report, Amaknak Pre-WWII Tank Farm Formerly Used Defense Site, Property #: F10AK0841-03, USACE Contract W911KB-08-D-0003 Task Order 25*.

ATTACHMENT A





- PLAN SHEET LEGEND**
- EP – EAST POINT ROAD
 - TD – TRAPPER DRIVE
 - PH – POWERHOUSE
 - SOH – STANDARD OIL HILL
 - PF – PTARMIGAN FLATS

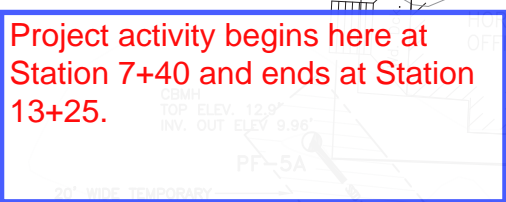
Work Area Vicinity Map

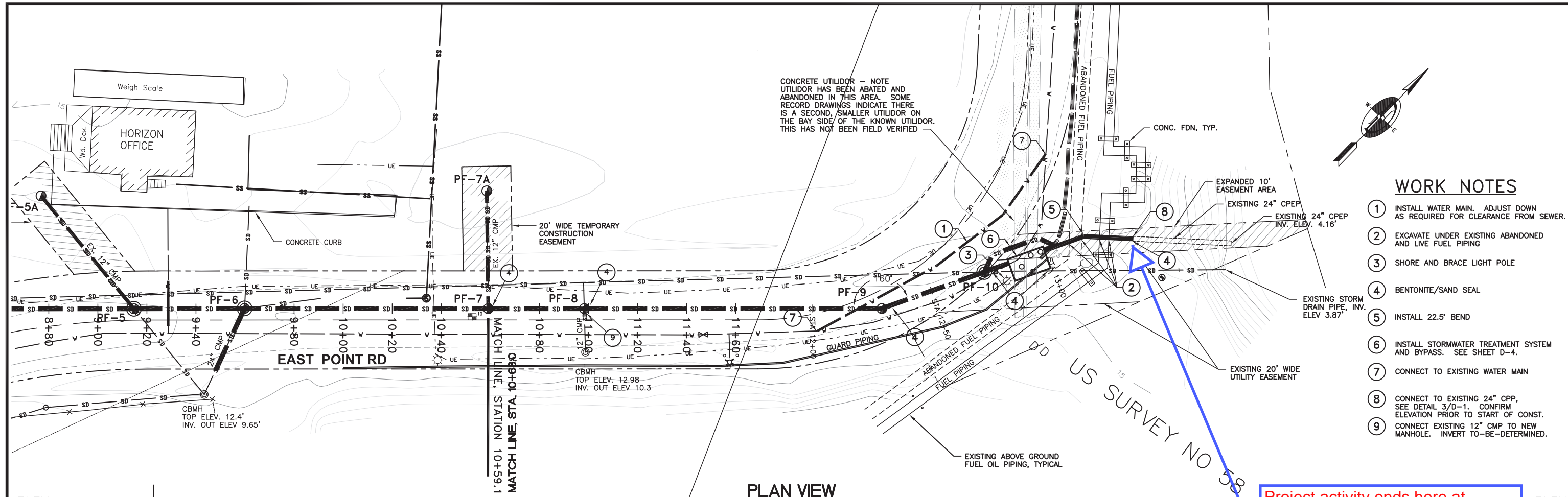
KEY MAP – PLAN & PROFILE SHEET LOCATIONS

FOR REVIEW 08/29/16



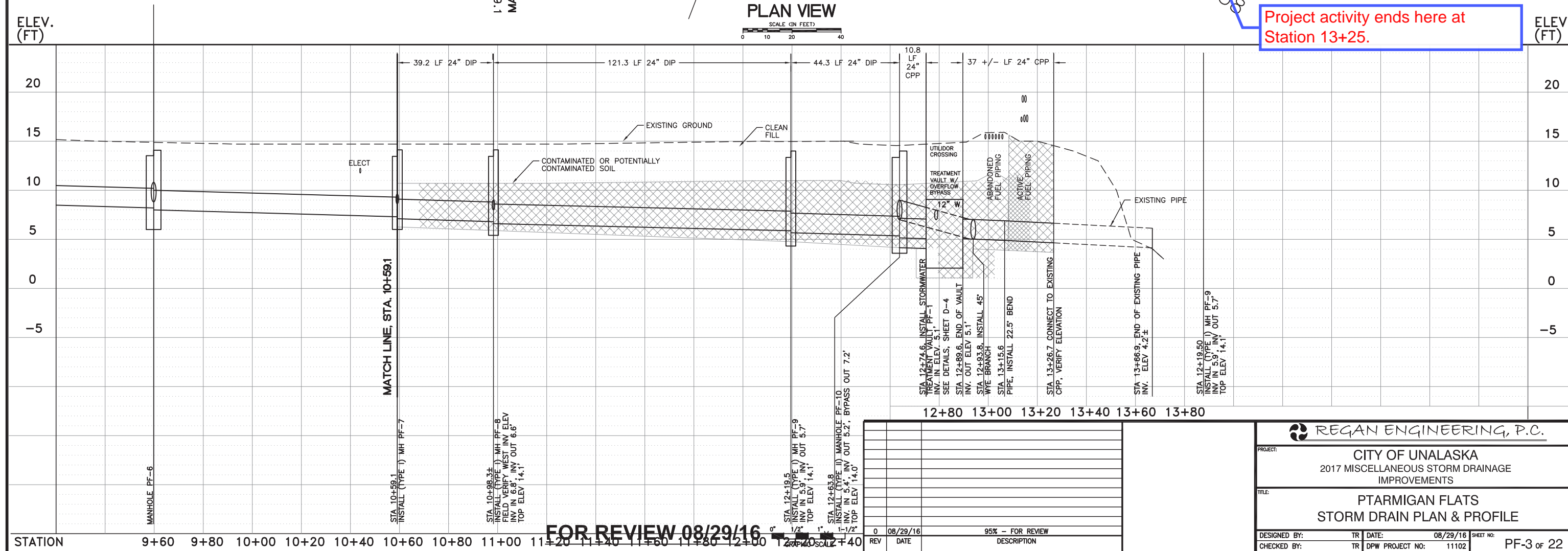
REGAN ENGINEERING, P.C.			
PROJECT: CITY OF UNALASKA 2017 MISCELLANEOUS STORM DRAINAGE IMPROVEMENTS			
TITLE: PLAN & PROFILE SHEET KEY MAP			
DESIGNED BY: TR	DATE: 08/29/16	SHEET NO: G-2 of 22	
CHECKED BY: TR	DPW PROJECT NO: 11102		





- WORK NOTES**
- 1. INSTALL WATER MAIN. ADJUST DOWN AS REQUIRED FOR CLEARANCE FROM SEWER.
 - 2. EXCAVATE UNDER EXISTING ABANDONED AND LIVE FUEL PIPING
 - 3. SHORE AND BRACE LIGHT POLE
 - 4. BENTONITE/SAND SEAL
 - 5. INSTALL 22.5" BEND
 - 6. INSTALL STORMWATER TREATMENT SYSTEM AND BYPASS. SEE SHEET D-4.
 - 7. CONNECT TO EXISTING WATER MAIN
 - 8. CONNECT TO EXISTING 24" CPP, SEE DETAIL 3/D-1. CONFIRM ELEVATION PRIOR TO START OF CONST.
 - 9. CONNECT EXISTING 12" CMP TO NEW MANHOLE. INVERT TO-BE-DETERMINED.

Project activity ends here at Station 13+25.



REGAN ENGINEERING, P.C.

PROJECT: CITY OF UNALASKA
2017 MISCELLANEOUS STORM DRAINAGE IMPROVEMENTS

TITLE: PTARMIGAN FLATS
STORM DRAIN PLAN & PROFILE

DESIGNED BY: TR DATE: 08/29/16 SHEET NO: 11102
CHECKED BY: TR DPW PROJECT NO: 11102

0 08/29/16 95% - FOR REVIEW
REV DATE DESCRIPTION

PF-3 of 22

ATTACHMENT B

WELL SAMPLING AGREEMENT

This WELL SAMPLING AGREEMENT ("Agreement") is entered into by and between CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY, a California corporation ("EMC") and the CITY OF UNALASKA ("City").

RECITALS

A. EMC is the owner and/or is in control of three (3) groundwater monitoring wells identified as MW-03R, MW-15, and MWRP-16 (the "Wells"), located in the vicinity of East Point Loop Road, in the City of Unalaska, State of Alaska (the "Property") as shown on Exhibit A attached hereto.

B. City has requested the use of the Wells for the purpose of periodically obtaining groundwater elevation data to assist in planning for the 2017 storm drain installation project on East Point Road in the City of Unalaska ("Sampling Events"); and

C. EMC is willing to grant City a license to access the Wells to perform the Sampling Events.

NOW, THEREFORE, in consideration of the execution of this Agreement, the receipt and sufficiency of which is hereby acknowledged, EMC and City agree as follows:

TERMS AND CONDITIONS

NOW, THEREFORE, in consideration of the mutual covenants and promises herein, the parties hereby agree as follows:

1. Rights Granted. EMC hereby grants to City, its employees, agents, representatives, consultants, and contractors permission to use the Wells to perform the Sampling Events (the "Work"). The Wells are located on properties that are not owned by EMC; therefore, City shall obtain written permission from the property owners prior to entering any property to sample the Wells. City agrees to provide a copy of said permissions to EMC upon EMC's request; however, EMC's receipt of said documentation shall not be construed as an acknowledgement that the documentation is sufficient nor confirmation that the adequate permissions are in place.

2. Performance of the Work. City shall conduct and perform the Work in a prompt, safe, efficient, and workmanlike manner and in compliance with all applicable federal, state, or local laws, regulations or ordinances. City shall perform all Work at its sole cost and expense.

3. Notice. Prior to accessing the Wells, City shall give EMC at least 30 days' prior written notice. EMC has the right to observe any activities performed on the Wells by City and also has the right to take split samples of any samples collected by City.

4. Term. This Agreement shall terminate upon completion of the Work or December 31, 2017, whichever occurs first. Subject to the restrictions in Section 5 (Indemnity) and 6 (Restoration), either party may terminate this Agreement prior to the expiration of the term set

forth herein upon written notification. Any termination hereunder shall be effective immediately after written notification of such termination is provided to the other party.

5. Indemnity. City agrees to release, indemnify, defend and hold harmless EMC, and its parents, affiliates (including, but not limited to, Chevron Corporation), subsidiaries, directors, officers, counsel, employees, representatives, agents, predecessors, successors, and assigns from any claims, causes of action, or lawsuits relating to the performance of the Work, including but not limited to, any acts or omissions of City, its agents and consultants, and any agents or subcontractors of such consultants. City's obligations under this Paragraph 5 shall survive termination of this Agreement.

6. Restoration. If exercise by City of any of its rights or obligations under this Agreement results in any physical damage to the Wells or the real property where the Wells are located, City shall promptly notify EMC and EMC shall determine if City shall repair and restore the Wells or the real property where the Wells are located or if EMC shall perform the repairs. In either case, all repairs and restoration activities shall be performed at City's sole cost and expense. City's obligations under this Paragraph 6 shall survive termination of this Agreement.

7. Insurance. City shall require contractors who perform the Work under this Agreement to maintain liability insurance coverage in accordance with the contractors' service agreements.

8. Notices. Any notices required to be made under this Agreement shall be made in writing to the address of the appropriate party as set forth below. All such notices shall be deemed to have been duly given and received upon mailing or delivery by courier or personal delivery service. Notwithstanding the foregoing, communications pursuant to Section 1 (Rights Granted), 3 (Notice), and 10 (Reports) may be delivered by email. Parties may alter or modify their notice address by delivery of written notice pursuant to the terms of this Agreement.

To EMC:

Chevron Environmental Management Company
Marketing Business Unit
6001 Bollinger Canyon Road
San Ramon, CA 94583
Attn.: Property Specialist, SS # 1001428
Phone: (925) 842-1819
Email: KYork@Chevron.com

To City:

City of Unalaska
P.O. Box 610
Unalaska, AK 99685
Attn: Robert Lund
Phone: (907) 581-1260
Email: rlund@ci.unalaska.ak.us

9. Reports. City shall promptly provide EMC with copies of all laboratory test results relating to the Wells and shall simultaneously provide EMC with all final reports and other communications submitted to Alaska Department of Environmental Conservation regarding the

Work. Upon request by EMC, City shall provide copies of field notes and other information generated during the performing of the Work.

10. Applicable Law. This Agreement shall be interpreted, and any dispute arising hereunder shall be resolved, in accordance with the laws of the State of Alaska, without reference to choice of law rules.

11. Counterparts. This Agreement may be executed in counterparts, both of which together shall constitute one and the same agreement. An email copy of an original signature shall be deemed to have the same force and effect as the original signature.

12. No Admission of Liability. The parties acknowledge and agree that this Agreement, the act of entering into it, and any act or omission pursuant hereto shall not be construed as an admission of any nature.

13. Compliance with Laws. Throughout the term of this Agreement, City shall at all times comply fully with all applicable laws, ordinances, rules, and regulations.


14. Assignment. City shall not transfer or assign this Agreement without EMC's prior written consent.

IN WITNESS WHEREOF, the parties have caused this Agreement to be executed and effective as of the last date set forth below.

EMC:

Dated: January 12, 2017

**CHEVRON ENVIRONMENTAL
MANAGEMENT COMPANY,**
a California corporation

By: 
Name: Grace P. Nerona
Its: Assistant Secretary

CITY:

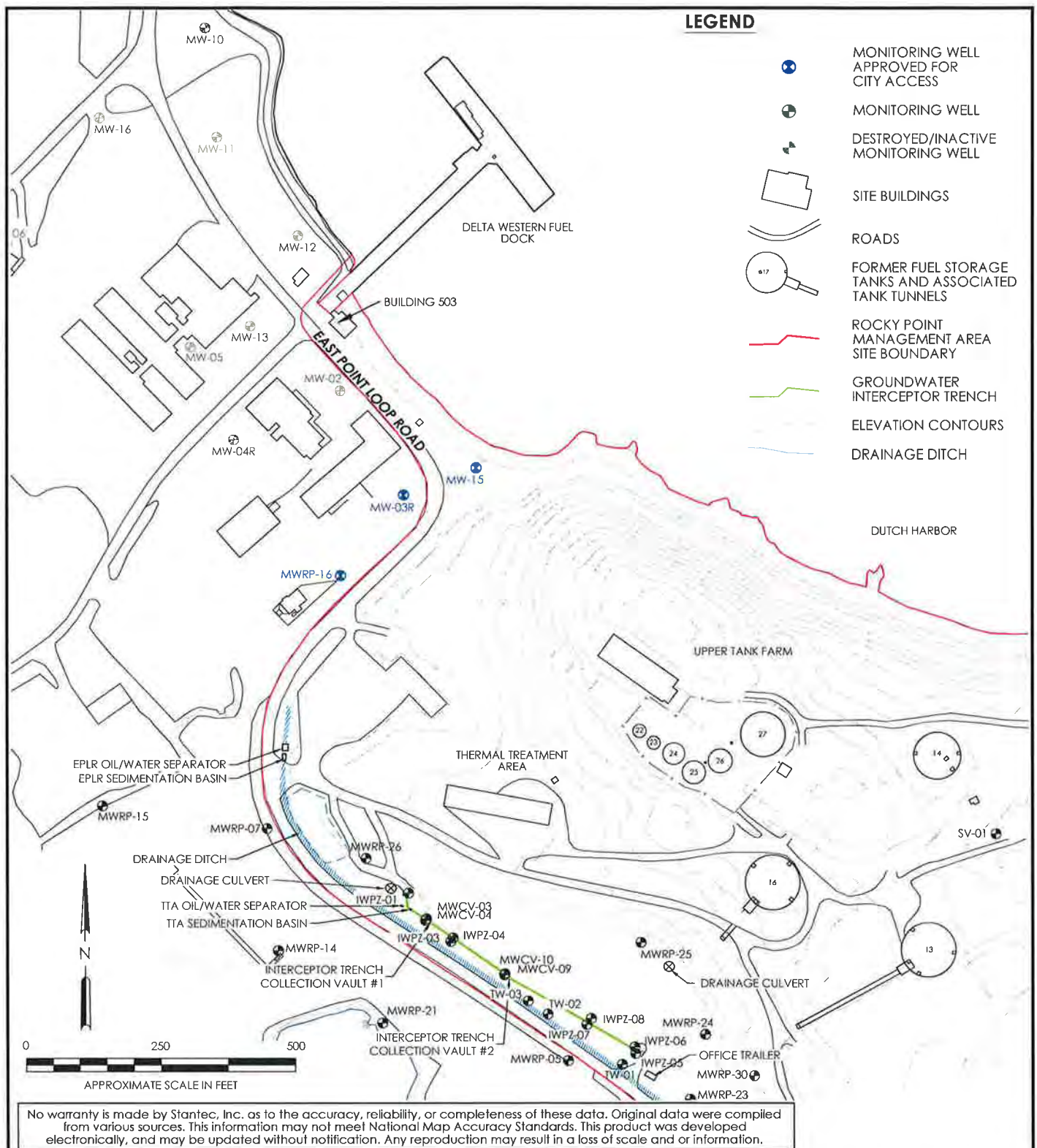
Dated: January 17, 2017


CITY OF UNALAKA

By: 
Name: DAVID MARTINSON
Its: CITY MANAGER

EXHIBIT A

**SITE PLAN DEPICTING LOCATION OF
THE PROPERTY AND WELLS**



 <p>2321 Club Meridian Drive, Suite E Okemos, Michigan PHONE:(517) 349-9499 FAX:(517) 349-6863</p>	FOR: CHEVRON ROCKY POINT MANAGEMENT AREA DUTCH HARBOR, UNALASKA, ALASKA		EXHIBIT A		EXHIBIT: A
	JOB NUMBER: 213201074	DRAWN BY: JRO	CHECKED BY: BAL	APPROVED BY: MJC	DATE: 10/13/16

Robert Lund

From: Carlson, Matthew <Matthew.Carlson@stantec.com>
Sent: Tuesday, September 20, 2016 9:12 AM
To: Robert Lund; Lucyk, Brent; Sesti, Tony
Subject: RE: RPMA Request

Thanks Robert. Dan Carrier did get back to me today and he does not object to you accessing the wells. However, Chevron's legal is going to draft up an access agreement for the wells.

I have started that ball rolling and will let you know if I need any further information. I will get it over to you for signature soon I hope.

Thanks,

Matt

Matthew Carlson, PE

Senior Engineer
Stantec
2321 Club Meridian Drive Suite E Okemos MI 48864-4588
Phone: (517) 349-9499 x 232
Cell: (517) 202-0236
Fax: (517) 349-6863
Matthew.Carlson@stantec.com



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 Please consider the environment before printing this email.

From: Robert Lund [mailto:rlund@ci.unalaska.ak.us]
Sent: Tuesday, September 20, 2016 12:51 PM
To: Carlson, Matthew <Matthew.Carlson@stantec.com>; Lucyk, Brent <Brent.Lucyk@stantec.com>; Sesti, Tony <Tony.Sesti@stantec.com>
Subject: RE: RPMA Request

Thanks Matt,

We will get an access permit from OC and we'll have a WP report similar to the attached. Section 2.1 addresses GWM and Attachment C is an example of the email we had from USACE on Delta Way for GWM. Our contractor is required to hire an ADEC approved consultant to be onsite for the duration therefore anyone accessing the wells will be qualified to do so.

Robert

Robert Lund, P.E.
City Engineer, City of Unalaska
Office: 907-581-1260
Mobile: 907-359-5022

From: Carlson, Matthew [<mailto:Matthew.Carlson@stantec.com>]
Sent: Tuesday, September 20, 2016 5:28 AM
To: Robert Lund; Lucyk, Brent; Sesti, Tony
Subject: RE: RPMA Request

Robert,

Attached is the 2016 groundwater elevation data you requested. Below is a link to an FTP site for the 2015 Annual Report.

I will email Dan Carrier at Chevron concerning your access request. He is currently on vacation and will not return until next week. I will also email Joe Pipinich at Delta Western.

I believe you will have to contact the OC for property access. Delta Western leases the land and we have an access agreement with OC in place for our access.

I think the wells you referenced are all flush mounts. The MW cap on the PVC is locked however you should be able to remove it without unlocking them. Please do so with care and try to replace the cap back on the PVC casing.

Thanks and hope all is well.

Matt

Your directory has successfully been created!

Please use the link below to access your directory with the username and password provided.

NOTE: FTP directories are not included in Stantec daily backups and are only intended to be used as a means of transferring large files between offices, clients, etc.

Login Information

Browser link: <https://tmpsftp.stantec.com>

FTP Client Hostname: tmpsftp.stantec.com **Port:** 22 (can be used within an FTP client to view and transfer files and folders; e.g., FileZilla)

Login name: s1004062830

Password: 9323484

Disk Quota: 2GB

Expiry Date: 10/4/2016

If you require a one-time two-week extension, please click [here](#).

If you require more than 2 weeks, please request a Project FTP Directory. Information on the Project FTP Directory request procedure is posted in the [StanNet Help Center](#).

Click here for the [quick reference guide](#).

DISCLAIMER: All files uploaded and downloaded on Stantec FTP directories are intended for business purposes only. Stantec maintains the right to monitor all activities on its FTP directories.

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Matthew Carlson, PE

Senior Engineer
Stantec
2321 Club Meridian Drive Suite E Okemos MI 48864-4588
Phone: (517) 349-9499 x 232
Cell: (517) 202-0236
Fax: (517) 349-6863
Matthew.Carlson@stantec.com



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 Please consider the environment before printing this email.

From: Robert Lund [<mailto:rlund@ci.unalaska.ak.us>]

Sent: Monday, September 19, 2016 6:23 PM

To: Carlson, Matthew <Matthew.Carlson@stantec.com>; Lucyk, Brent <Brent.Lucyk@stantec.com>; Sesti, Tony <Tony.Sesti@stantec.com>

Subject: RPMA Request

Hi Okemos,

With regards to a 2017 storm drain installation on East Point Road Unalaska DPW could make use of GW elevation data.

- May I have the latest excel version of Table 2 Groundwater Elevation Data from the Annual Area-Wide Groundwater Monitoring and Operations and Maintenance Report – 2016? And the last published report PDF?
- A future contractor may elect to open selected monitoring wells to monitor GW elevations prior to construction. To excavate at times that dewatering would not be necessary. We were able to obtain permission from USACE on Delta Way and subsequent ADEC approval. Would it be possible to obtain a message of non-objection from Stantec or EMC for MW-03R, MW-15, and MWRP-16?

Robert

Robert Lund, P.E.

City Engineer, City of Unalaska
Office: 907-581-1260
Mobile: 907-359-5022

ATTACHMENT C

Robert Lund

From: Dooley, Meghan K (DEC) <meghan.dooley@alaska.gov>
Sent: Friday, February 15, 2013 1:41 PM
To: Robert Lund
Subject: FW: Unalaska Storm Drain Project

Robert,

I checked with the Division of Water (see email chain below). You will have to submit a work plan for ADEC approval that includes treatment and discharge of decon water onsite. When do you anticipate to start the work?

Meghan

From: Greuey, John J (DEC)
Sent: Friday, February 15, 2013 1:37 PM
To: Dooley, Meghan K (DEC)
Subject: RE: Unalaska Storm Drain Project

Meghan,

If their quantities are less than 250,000 gallons they don't have to submit an NOI and will just have to comply to the field monitoring requirements of the permit and keep on site documentation.

Thanks,

Jake Greuey
Environmental Program Specialist IV
Alaska DEC - Division of Water
555 Cordova Street
Anchorage, AK 99501
907-269-8117

From: Dooley, Meghan K (DEC)
Sent: Friday, February 15, 2013 12:57 PM
To: Greuey, John J (DEC)
Subject: Unalaska Storm Drain Project

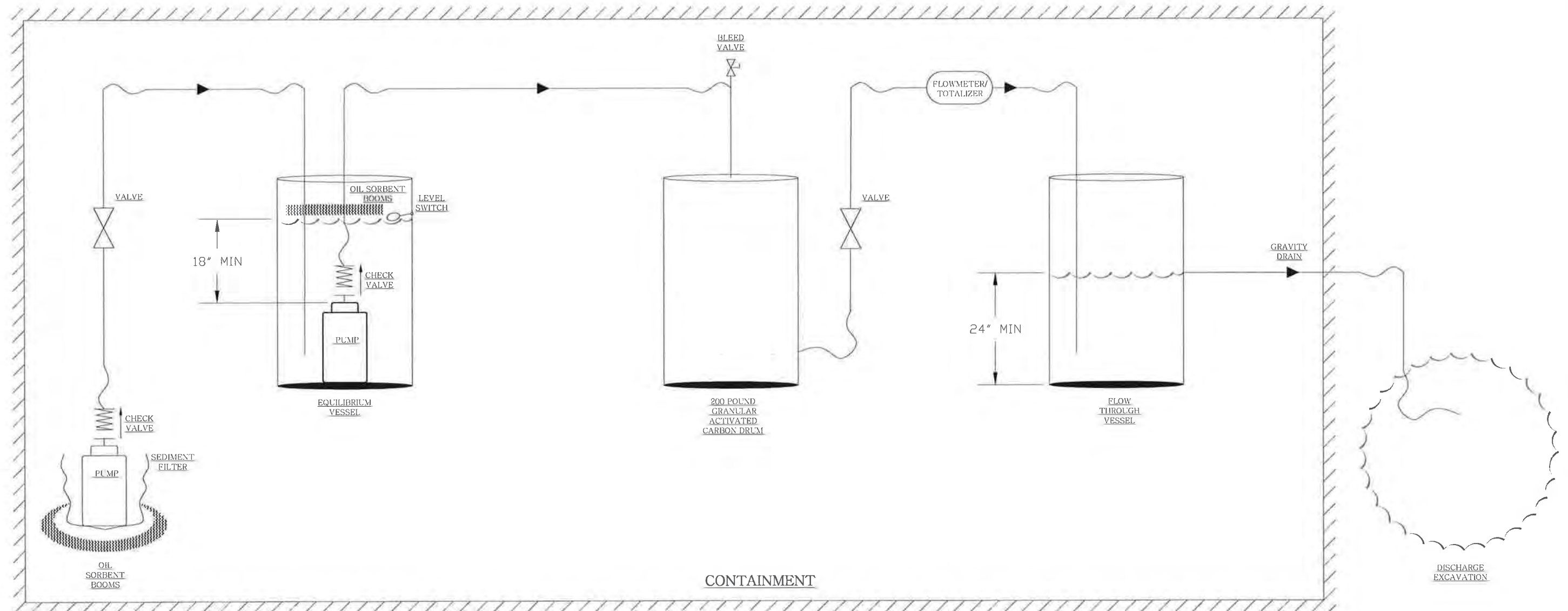
Jake,

I have a question about discharge permits. The City of Unalaska is installing a new storm drain this summer and does not think they will have to do any de-watering, and so the only water they will have to deal with is decontamination rinsate which will be relatively minimal. We can approve them to treat and dispose of it onsite. If they end up having to dewater an excavation and the amount is less than 250,000 gallons, do they have to apply for the general permit and submit a Notice of Intent through the Division of Water or just comply with requirements in the permit? They will be going through a known contaminated site. Please let me know what you think.

Thank you,

Meghan Dooley
Environmental Program Specialist
ADEC Contaminated Sites Program
(907) 269-3056

ATTACHMENT D



NOTES:

THE TREATMENT SYSTEM FILTERS DECONTAMINATION RINSATE FROM DECONTAMINATION OF OILY EQUIPMENT. CONTROL IS MANUAL EXCEPT FOR A LEVEL SWITCH IN THE EQUILIBRIUM VESSEL.

ALL EQUIPMENT AND ASSOCIATED INSTALLATION MUST CONFORM WITH APPLICABLE FEDERAL, STATE, CITY CODES, AND MANUFACTURER RECOMMENDATIONS, FOR THE APPLICATION AND LOCATION.

PROCESS:

1. DECONTAMINATE EQUIPMENT IN THE CONTAINMENT USING POTABLE WATER AND A PROJECT DETERGENT.
2. DECONTAMINATION RINSATE FLOWS ALONG THE FLOOR OF THE CONTAINMENT TO A CORNER.
3. DECONTAMINATION RINSATE THEN FLOWS AROUND AN OIL SORBENT BOOM AND A SEDIMENT FILTER TO THE CONTAINMENT PUMP.
4. THE CONTAINMENT PUMP IS TURNED ON MANUALLY AND PUMPS DECONTAMINATION RINSATE TO THE EQUILIBRIUM VESSEL.
5. THE EQUILIBRIUM VESSEL ACTS AS AN OIL WATER SEPARATOR. OIL IS COLLECTED AT THE SURFACE WITH AN OIL SORBENT BOOM. THE WATER LEVEL IS MAINTAINED AT LEAST 18 INCHES ABOVE THE PUMP WITH A LEVEL SWITCH TO PREVENT OILY SHEEN FROM ENTERING THE CARBON DRUM.
6. THE EQUILIBRIUM VESSEL PUMP MOVES SEPARATED WATER THROUGH THE CARBON DRUM.

7. THE FLOW THROUGH CELL IS A MONITORING POINT. A GRAVITY DRAIN CONVEYS TREATED WATER INTO THE DISCHARGE EXCAVATION.
8. FOLLOW AND LOG THE FOLLOWING ON A DAILY BASIS EVEN IF TREATMENT SYSTEM IS NOT USED:
 - 8.1. TREATMENT EQUIPMENT - THE EQUIPMENT USED AND ITS CONDITION.
 - 8.2. SEPARATION - VISUALLY MONITOR THE EQUILIBRIUM VESSEL AT ALL TIMES. OILY SHEEN MUST NOT ENTER THE CARBON DRUM.
 - 8.3. FLOW - THE DAILY AND CUMULATIVE VOLUME OF FLOW AND THE FLOW RATE. THE FLOW RATE IS NOT TO EXCEED A RATE OF 5 GPM PER SQUARE FOOT OF HORIZONTAL GRANULAR ACTIVATED CARBON BED AND A PROJECT TOTAL OF 5,000 GALLONS.
 - 8.4. OILY SHEEN - VISUALLY MONITOR THE FLOW THROUGH VESSEL FOR OILY SHEEN AT ALL TIMES DURING DISCHARGE. IF AN OILY SHEEN IS OBSERVED IMMEDIATELY CEASE DISCHARGE.
 - 8.5. DISCHARGE EXCAVATION - INFILTRATION INTO THE SOIL MUST OCCUR MORE THAN 100 FEET FROM SURFACE WATERS INCLUDING ILIULIUK BAY.



MANUAL TREATMENT SYSTEM FLOW DIAGRAM

ATTACHMENT E



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

610 University Ave.
Fairbanks, Alaska 99709-3643
Main: 907.451.2192
Fax: 907.451.5105

File: 2542.38.018

March 8, 2017

Robert Lund, P.E.
City Engineer, City of Unalaska
PO Box 610
Unalaska, Alaska 99685

Re: Approval of the Revised "Waste Management Work Plan Addendum II for
Ilulaq Lake/East Point Road"

Dear Mr. Lund:

The Department of Environmental Conservation, Contaminated Sites Program has reviewed and hereby approves the Revised Work Plan received electronically on February 1, 2017. Thank you for addressing our comments in this revision. I have saved this document to our electronic files, submittal of a hardcopy is not necessary.

Sincerely,

Kim DeRuyter
Environmental Program Manager

Robert Lund

From: Weiss-Racine, Holly F (DEC) <holly.weiss-racine@alaska.gov>
Sent: Tuesday, January 24, 2017 4:59 PM
To: Robert Lund
Cc: DeRuyter, Kimberly S (DEC)
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulak Lake/East Point Road

Great working with you!

Please send all future coordination on this project to Kim DeRuyter: kim.deruyter@alaska.gov

Thank you,
Holly

-----Original Message-----

From: Robert Lund [<mailto:rlund@ci.unalaska.ak.us>]
Sent: Tuesday, January 24, 2017 4:50 PM
To: Weiss-Racine, Holly F (DEC) <holly.weiss-racine@alaska.gov>
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulak Lake/East Point Road

I will thank you.

Robert Lund, P.E.
City Engineer, City of Unalaska
Office: 907-581-1260
Mobile: 907-359-5022

-----Original Message-----

From: Weiss-Racine, Holly F (DEC) [<mailto:holly.weiss-racine@alaska.gov>]
Sent: Tuesday, January 24, 2017 4:49 PM
To: Robert Lund
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulak Lake/East Point Road

Hi Robert,

Can you please send a final copy of the report over for approval?

Thank you,
Holly

-----Original Message-----

From: Robert Lund [<mailto:rlund@ci.unalaska.ak.us>]
Sent: Friday, December 16, 2016 4:23 PM
To: Weiss-Racine, Holly F (DEC) <holly.weiss-racine@alaska.gov>
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulak Lake/East Point Road

We are not in a hurry. Enjoy your time off.

Robert Lund, P.E.

City Engineer, City of Unalaska
Office: 907-581-1260
Mobile: 907-359-5022

-----Original Message-----

From: Weiss-Racine, Holly F (DEC) [<mailto:holly.weiss-racine@alaska.gov>]
Sent: Friday, December 16, 2016 4:21 PM
To: Robert Lund
Cc: Tom Cohenour; Thomas
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulaq Lake/East Point Road

Thank you Robert.

I am heading out the door now and I will not be back until January 3rd. I will take a look at this when I return. If you need immediate assistance, please contact Guy Warren 269-7528.

Thank you,
Holly

-----Original Message-----

From: Robert Lund [<mailto:rlund@ci.unalaska.ak.us>]
Sent: Friday, December 16, 2016 3:32 PM
To: Weiss-Racine, Holly F (DEC) <holly.weiss-racine@alaska.gov>
Cc: Tom Cohenour <tcohenour@ci.unalaska.ak.us>; Thomas <tom@reganengineering.com>
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulaq Lake/East Point Road

Holly,

I attached the requested responses for the comments you sent to us back in October.

Regards,

Robert Lund, P.E.
City Engineer, City of Unalaska
Office: 907-581-1260
Mobile: 907-359-5022

-----Original Message-----

From: Weiss-Racine, Holly F (DEC) [<mailto:holly.weiss-racine@alaska.gov>]
Sent: Friday, October 07, 2016 9:16 AM
To: Robert Lund
Cc: Tom Cohenour; Thomas
Subject: RE: City of Unalaska – Storm Drainage Projects - Ilulaq Lake/East Point Road

Robert,

Please find the attached comments to the draft work plan addendum. You can insert your responses in the attached word table and return them to me for review before producing the final work plan for approval.

Thank you,
Holly
907-269-0298

Alaska Department of Environmental Conservation
Comments on the Draft “Waste Management Work Plan Addendum for Ilulaq Lake/East Point Road”
Commenter: Holly Weiss-Racine (ADEC) Comments Developed: January 31, 2017

Cmt. No.	Pg. & Line	Sec.	Comment/Recommendation	Response
1.	1.1	1.0	Please add the referenced figure to Attachment A of this work plan (with stationing that makes it clear where the project activity is taking place).	Four sheets have been added to Attachment A from the civil plans. The relevant work occurs from previously characterized Station 7+40 to Station 13+25. As before work above 7+40 (Above East Point Road in the Matson Yard) was considered outside the scope because groundwater is not anticipated and responsible party maps define the area as outside the contaminated site.
2.		General	If the work will be occurring along East Point Road from Delta Way northwest towards Biorka drive, PCB analysis and waste management will be required and needs to be incorporated into this work plan. If the work is along East Point Road from Delta Way southeast towards monitoring wells MW-3R, MW-15 and MW-16, no PCB sampling and waste management is required. Please clarify.	PCB management does not appear to be required. Work is along East Point Road from Delta Way southeast towards monitoring wells MW-3R, MW-15 and MW-16, no PCB sampling and waste management is required.
3.	2.3	2.0	In paragraph 1, please update the qualified person criteria and references. 18 AAC 75 was updated in May 2016 to include a specific definition for a <i>qualified environmental</i>	This comment has been addressed by reference from the

Alaska Department of Environmental Conservation
Comments on the Draft “Waste Management Work Plan Addendum for Ilulaq Lake/East Point Road”
Commenter: Holly Weiss-Racine (ADEC) Comments Developed: January 31, 2017

Cmt. No.	Pg. & Line	Sec.	Comment/Recommendation	Response
			<i>professional</i> (18 AAC 75.333b) and a <i>qualified sampler</i> (18 AAC 75.333c).	definitions section. The text has been changed as follows: “This document is sealed by an Alaska registered professional environmental engineer in accordance with 12 AAC 36.990 (36). The preparer of this Work Plan Addendum II is an employee of the City and a Qualified Environmental Professional and Qualified Sampler as stipulated in 18 AAC 75.990(187-188) and conditionally approved by ADEC. All work proposed in this Work Plan Addendum must be performed by or supervised by individuals meeting the criteria of Qualified Environmental Professionals and Qualified Samplers per 18 AAC

Alaska Department of Environmental Conservation
Comments on the Draft “Waste Management Work Plan Addendum for Ilulaq Lake/East Point Road”
Commenter: Holly Weiss-Racine (ADEC) Comments Developed: January 31, 2017

Cmt. No.	Pg. & Line	Sec.	Comment/Recommendation	Response
				75.990(187-188). The work must be conducted in accordance with this document, and all applicable local, state, and federal laws.”
4.	2.6	2.2.4	Mid-page, please update the references to the current ADEC Filed Sampling Guidance (March 2016).	<p>The sampling guidance is referenced in two locations both of which have been revised as follows:</p> <p>Personnel will field screen soils with the PID, in accordance with Section 3.2 Field Screening, of the ADEC March 2016 Field Sampling Guidance. The confirmation samples will be collected in accordance with Section 3.4 and 3.5 of the ADEC March 2016 Field Sampling Guidance noted in Table 1 below and the SAP/QAP Attachment D from the Work Plan.</p>

Alaska Department of Environmental Conservation
Comments on the Draft “Waste Management Work Plan Addendum for Ilulaq Lake/East Point Road”
Commenter: Holly Weiss-Racine (ADEC) Comments Developed: January 31, 2017

Cmt. No.	Pg. & Line	Sec.	Comment/Recommendation	Response
				The following table will be used to monitor discharge of effluent treated water in general accordance with Table 1 of ADEC General Permit AKG002000 and ADECs March 2016 Field Sampling Guidance Section 4.
5.			-- End Comments --	