



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File: 1529.38.006

September 27, 2017

Lisa Von Bargaen
Borough Manager
City and Borough of Wrangell
PO Box 531
Wrangell, AK 99929

RE: Soil Disposal Options for the Wrangell Junkyard Cleanup, Hazard ID# 3295

Dear Ms. Von Bargaen:

Thank you for your letter on September 8, 2017, requesting information about The Alaska Department of Environmental Conservation's (ADEC) process and necessary steps for completing the project should an alternative, such as offsite disposal or a different location for the monofill, become available.

I have provided responses to each of your five questions as follows:

1. If an alternative on-island disposal location is identified by the community, what is the formal process required to request that ADEC review the site for viability, and is funding available through ADEC to conduct the site testing necessary to determine viability?

As you are likely aware, during 2016, ADEC, the City and Borough of Wrangell, and the Department of Natural Resources (DNR), gave considerable attention to evaluating all the potential sites available in the Wrangell area that were either on City or State land.

It is ADEC's understanding that there are no other viable sites on either City or State land beyond those that were evaluated. United States Forrest Service (USFS) land would not be an option, and no privately held land is likely to materialize. Other state land managed by the Division of Forestry will be strictly for forest related uses. State land was chosen in large part because the DNR had a share in the liability for contamination at the junkyard property where it had encroached onto state land. Therefore, the contribution of state land for the monofill allowed the agency to provide an in-kind contribution for the cost of the cleanup of that part of the contamination.

The State is willing to take a look at other sites only if they have a strong potential to be suitable and would agree to cover the costs to consider their viability as far as a. and b., below. If a viable alternative site were to materialize in the borough, several issues would need to be addressed:

- a. The site would need adequate space to contain the volume of soil.
 - b. The site would need to meet the criteria under the Solid Waste Program for constructing a monofill. These include:
 - A new landfill must be at least 500 feet from a drinking water well. (A similar setback should be considered in an area in which surface water is the drinking water source.)
 - The base of the landfill must be at least 10 feet above the highest measured level of the uppermost aquifer, unless the landfill is built two or more feet above the natural ground surface.
 - The landfill cannot be located on a slope with more than a 10% grade.
 - The landfill cannot be located in a wetland unless there is no practicable alternative.
 - c. If on State land, a DNR Development Plan would need to be completed and potentially a public notice would be issued. This process took about three months for the current location. Subsequent steps listed below cannot be completed until DNR has provided its concurrence for the site. If the alternative parcel is under other ownership, other permits or requirements may need to be fulfilled depending on the terms of the landowner.
 - d. For any location, a hydrologic and leaching evaluation would need to be completed. This would take about three months including procurement time, but depends on the time of year, weather and site accessibility.
 - e. For any location, a new engineering design would need to be developed. The design for the current site was completed by the Environmental Protection Agency (EPA) contractors as a contribution to the project by the agency. This service would not be available to us a second time. We anticipate it would be more expensive for ADEC to contract and obtain a new engineering design document than it was for EPA. Design time for this project took approximately five months following completion of the hydrologic and leaching study. Additional time would be required for the procurement process.
 - f. For a parcel of undisturbed land, additional costs and time include constructing road access, clearing, and excavation to prepare the site.
 - g. For a parcel located further from the junkyard site than the current monofill location, there will be additional costs for fuel and haul time.
 - h. Adequate funding would need to be available to complete the study, design, construction and disposal.
2. If an alternative site is found to be viable, is funding available through ADEC for design and engineering of a monofill solution at the new site?

Due to the amount of funding committed to this current location, ADEC would not be able to consider an alternative location without significant additional funding from some other source. At the time of this writing, costs incurred for siting the monofill at the current location include:

DNR Development Plan, Hydrologic and Leaching Evaluation:	\$ 112,000
Engineering Design	\$ 100,000
Mobilization, Permitting, and Site Preparation July-October 1:	\$ 920,000
State oversight costs:	\$ 63,000
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Total:	\$ 1,195,000

3. What is the deadline by which an alternative location would need to be identified in order for all necessary work to be done so the contaminated soil could be transported in 2018?

Unfortunately, even if a site were settled on by the end of September 2017 and sufficient funding for this new option was secured, there would not be adequate time to do the necessary scientific and engineering work, followed by site preparation, to complete transport of all the treated material during the calendar year of 2018.

4. If additional funding is sought for off-island disposal, what is the deadline by which those funds need to be secured?

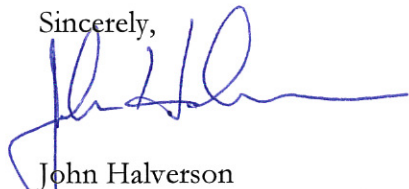
In order to complete shipment of all the material in 2018, a firm funding commitment would be needed at least two months prior to April 1, 2018 in order to complete the necessary procurement modifications with contractors, for contractors to coordinate, procure, and ship containers to the site, and to secure a loading and staging area in Wrangell that has adequate space for storing the containers and barge access. The local shipping yard lacks this capacity.

5. The estimated cost for off-island disposal is \$12 million. The current on-island disposal cost is \$5.7 million. If additional funding is obtained, but is not enough to fully bridge the \$6.3 million gap, would the State be willing to release additional funds?

The State has allocated 5.7 million for the project as currently scoped. Please understand that upon the conclusion of work this fall, the remaining balance for this project will be significantly less than \$5.7 million by April 1, 2018, and due to project delays this past summer, supplemental funding may be necessary to carry the project through to completion in 2018. Whatever funding remains for this project would be eligible for the effort to ship the material off-island, but the community would need to secure the balance of what is required, which will be in excess of \$6.3 million and more likely around \$8 million.

We look forward to continuing to work with the City and the community to complete this project in a timely manner that is both protective of human health and the environment and compliant with applicable requirements. Feel free to contact me at 269-7545, or Sally Schlichting at 465-5076, any time if you have questions or want to discuss the project.

Sincerely,



John Halverson
Environmental Program Manager
ADEC Contaminated Sites Program