



200 North Post Road Project Summary

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ACRONYMS

<u>ACRONYM</u>	<u>DEFINITION</u>
%	Percent
ppm	Parts Per Million
ARRC	Alaska Railroad Corporation
EPA	United States Environmental Protection Agency
mg/Kg	Milligrams Per Kilogram
MSDS	Material Safety Data Sheet
PPMI	Precision Pavement Marking, Inc.
QC	Quality Control
QA	Quality Assurance
RCRA	Resource Conservation and Recovery Act
RPD	Relative Percent Difference
VOC	Volatile Organic Compound
TCLP	Toxicity Characteristic Leaching Procedure
TSDF	Treatment, Storage and/or Disposal Facility
MS	Matrix Spike
MSD	Matrix Spike Duplicate
EAI	Emerald Alaska, Inc.
PCB	Polychlorinated Biphenyls
CESQG	Conditionally Exempt Small Quantity Generator
TCRAP	Time Critical Removal Action Plan
OSC	On-Site Coordinator
ESI	Emerald Services, Inc.
TCE	Trichloroethylene

EXECUTIVE SUMMARY

In 2006, SAN LLC subleased the outdoor fenced yard at 200 North Post Road to Precision Pavement Marking Inc. (PPMI) owned by William D. Vizzerra. PPMI specializes in highway, runway and parking lot traffic line striping. Equipment and containers of miscellaneous paint related material was stored on the premises. In late 2010, the EPA received information that the material was waste product improperly stored at the location, which prompted a site investigation. As a result of the site investigation, EPA personnel supervised the cleanup of equipment and personal items and also conducted initial sampling of onsite waste materials. Upon completion of the sampling, EPA created a lined containment area for storage of waste materials, which included various sized drums, 5-gallon pails, and 250-gallon bulk containers.

In June 2011, SAN LLC hired Emerald Alaska, Inc. (EAI) to write a Time Critical Removal Action Plan (TCRAP) and oversee the execution of the plan. On June 30, 2011 an application for an EPA Identification number was submitted by PPMI for the Post Road site. The application was approved on August 2, 2011 with EPA Identification number AKR000003970. PPMI was approved as an Episodic Large Quantity Generator of Hazardous Waste.

The TCRAP identified an estimated 324 drums, 171 5-gallon containers, and 2 each 250-gallon bulk containers of miscellaneous paints, solvents, oils, and fuels being stored onsite belonging to PPMI. The objective was to methodically and efficiently characterize these materials to facilitate proper waste management in accordance with Federal Regulations and to dispose of them at CERCLA approved facilities. Regulatory project oversight was provided by EPA's Coeur d'Alene Field Office. EAI coordinated with multiple transporters and disposal facilities to complete tasks outlined within the scope of work.

Removal activities were accomplished in three phases:

- Phase 1 included waste identification, characterizing, and sampling of waste (as needed) as well as identifying containers that required overpacking prior to transport. Phase 1 commenced on August 1, 2011 and was completed on August 5th.
- Phase 2 included overpacking 289 drums in preparation for transport. Phase 2 was conducted between August 10-12th and September 13-14th.
- Phase 3 included labeling and loading of containers into five each 53-foot trailers for transport to approved disposal facilities. Phase 3 was conducted between September 19th and September 23rd. The trailers were moved offsite on September 29th upon receipt of Continued Verification Approvals from EPA Regions 6 and 7.

The execution of the TCRAP was highlighted by zero reportable Health and Safety instances and the completion of the project on time according to the Task Schedule.

Onsite work began on August 1, 2011 and was completed in accordance with the TCRAP on September 29, 2011.

INTRODUCTION

Alaska Railroad Corporation (ARRC) is the owner of property located at 200 North Post Road, Anchorage Alaska. SAN LLC is the primary leaseholder, leasing the property from ARRC. SAN LLC subleased the outdoor fenced storage lot located at 200 North Post Road, Anchorage, to Precision Pavement Marking, Inc. (PPMI) owned by William D. Vizzerra. PPMI specialized in the application of highway, runway and parking lot markings.

The outdoor fenced storage lot located at 200 North Post Road, Anchorage, was investigated by the Environmental Protection Agency (EPA) in late 2010 after a report was submitted to EPA regarding improper storage of various containers and drums left onsite by PPMI.

Under EPA's supervision the site was cleaned up of all equipment and personal items during the winter months of 2010. An onsite secondary containment storage area consisting of poly liner material and railroad timbers was constructed. The 324 drums, 171 5-gallon containers and two 250-gallon bulk containers which were deemed inherently "waste like" by EPA were placed within the containment area.

June 2011 SAN LLC contracted Emerald Alaska, Inc. (EAI) to remove and dispose of the various containers located at 200 North Post Road. On June 30, 2011, an EPA Identification Number application was submitted to EPA Region 10 requesting that the site registration be changed from Kelly Moore Paints Co. to PPMI. This change was approved on August 3, 2011.

Working together, SAN LLC and EAI developed a Time Critical Removal Action Plan (TCRAP) which was approved by Earl Liverman EPA OSC on July 26, 2011. The TCRAP objective was to methodically and efficiently characterize these materials in order to facilitate proper management in accordance with Federal Regulations and disposal at CERCLA approved facilities.

SITE DESCRIPTION AND BACKGROUND

Site Location

SITE NAME	Post Road Drum Site
Property Owner	Alaska Railroad Corporation; leased to SAN LLC; rented to Precision Pavement Marking, Inc.
Business Information	Operated by Precision Pavement Marking, Inc. Business Owner: William Duran Vizzerra Jr. POC: Bruce Chambers, 907-565-5661
SSID#	10ZZ
Location	200 North Post Road, Anchorage , Alaska 99501
Latitude	61.223464°
Longitude	- 149.861306°

The property is located at 200 North Post Road Anchorage, Alaska. The drum site is located west of Post Road behind a warehouse structure which faces Post Road. The site is an outdoor fenced area that is used for storage. In 2005, Precision Pavement Marking Inc. (PPMI) started moving paint materials and equipment from 1702 Ship Avenue to 200 North Post Road. It was believed that the materials stored at the site were all usable products and the site was being utilized as a storage area only. (Attachment 2, Pic.1)

Site Layout

The site is located within a 90-foot by 100-foot chain-link fenced yard. The yard is a flat, unpaved surface. There are no established pathways or engineered drainage systems in the yard that contained the drums, 5-gallon pails and 250-gallon bulk containers. The containment area was made with heavy plastic sheets and railroad ties. (Attachment 2, Pic.2 and Pic.3)

Surrounding Land Uses

The site is located in an industrial and commercial business area of Anchorage. There are four businesses in the immediate area. Ship Creek and its public-use trail are located about 200 feet to the south. Residential neighborhoods begin a half of a mile from the site. Alaska Railroad Corporation (ARRC) rail lines and key railroad support facilities are located within one mile of the site.

Site History, Operations and Ownerships

The property located at 200 North Post Road, Anchorage, Alaska is owned by ARRC and has been leased by several tenants over its history. SAN LLC is currently the prime leaseholder from ARRC. Previous ARRC leaseholders include:

- Westinghouse, who, during the 1960s, conducted onsite electrical equipment and transformer repair.

- Continental Van Lines utilized the property for shipping container transfer and storage.
- Sourdough Transportation (presently subleasing from SAN LLC) utilizes the property for shipping container transfer and storage for the military.
- Alaska Packaging, Inc. is a packaging and shipping material wholesaler.
- Kelly Moore Paint Co. is a paint supply warehouse and distribution center whose products include paints, miscellaneous solvents and petroleum products. EPA Identification number AK000003970 was assigned to Kelly Moore Paint Co. for this site. Kelly Moore Paint Co. was a RCRA Conditionally Exempt Small Quantity Generator.
- Swalling Construction (presently subleasing from SAN LLC) is a heavy industrial construction contractor whose operations include industrial coating, lead abatement, bridge and dock repair, and structural preservation.

Current SAN LLC sub-leaseholders, other than Swalling Construction and Sourdough Transportation, located in the vicinity of the outdoor storage area include:

- Wingfoot Tires (aka Goodyear Tire) utilizes the property for storage and distribution of tires.
- Veteran Affairs utilizes the property for storage of various materials.
- Precision Pavement Marking Inc. (PPMI) utilized the property for storage of various equipment and containers of what was presumed to be usable product.

Previous site assessments have identified trichloroethylene (TCE) and polychlorinated biphenyls (PCB) as contaminants in various locations on the property. In 1990, an Environmental Service Limited site audit was completed prior to initiating remediation efforts onsite to clean up the PCB contamination left by Westinghouse. The engineering firm removed all soil that had laboratory results for PCB greater than 10ppm. In 1993, ADEC confirmed a "No Further Action" status for the site concerning PCB.

In 1999, soil borings were placed around the property while Kelly Moore Paint Co. was a tenant on the property. Laboratory tests were run on the soil, and TCE was found in the soil in various spots throughout the property as well as PCBs and petroleum hydrocarbons. Between 1999 and 2003 numerous tests to the soil were conducted on site as well as on the monitoring wells that were installed on the property. In 2005, volatile organic compounds (VOCs) (e.g. chlorinated benzene and chlorinated ethane) were detected within groundwater sample results from the site investigation. Due to the findings, ADEC concluded that the site has no determination of environmental status.

In 2006, SAN LLC subleased the outdoor, fenced area adjacent to Swalling Construction to PPMI. PPMI specializes in highway, runway and parking lot traffic line striping. By 2010 the outside yard was storing various pieces of equipment and approximately 500 containers of various paint related material. Environmental Protection Agency (EPA) began an investigation into the site during the same year. The site was cleaned up of all equipment and personal items under the EPA's supervision. The remaining items at the site consisted of drums, 5-gallon pails and 250-gallon bulk containers. These were moved into a containment area made from heavy plastic and railroad ties. In June 2011, SAN LLC hired Emerald Alaska, Inc. (EAI) to write a Time Critical Removal Action Plan (TCRAP) and oversee the execution of the

plan. On June 30, 2011 an application for an EPA Identification number was submitted by PPMI for the Post Road site. The application was approved on August 2, 2011 with EPA Identification number AKR000003970. PPMI was approved as an Episodic Large Quantity Generator. On August 1, 2011 work began on site and was completed in accordance with the TCRAP on September 29, 2011.

REMOVAL ACTION DESCRIPTION

Scope, Objectives and Goals

The TCRAP scope of work included identifying, characterizing, managing and disposing of an estimated 324 drums, 171 5-gallon containers and (2) 250-gallon bulk containers of miscellaneous paints, solvents, oils, and fuels being stored onsite belonging to PPMI. The objective was to methodically and efficiently characterize these materials to facilitate proper management and disposal. The goal was to remove all drums, 5-gallon pails and 250-gallon bulk containers off the property and dispose at CERCLA approved certified disposal facilities.

Modifications to the Removal Action Plan

Sample Trip Blanks

Sample trip blanks were not analyzed as stated in the TCRAP .The paint waste was a matrix containing high volatiles that would easily contaminate the trip blanks and render them invalid for Quality Assurance (QA) purposes.

Consolidation

Drum consolidation in the TCRAP was not able to be accomplished. After the plan had been approved it was determined during a meeting with the SAN LLC managing partners and Emerald Alaska, Inc. (EAI) that consolidation of the drums would be a risk. The risk involved in consolidating the drums may create further contamination, with the paint being so thick the drums could not be considered RCRA empty.

Closure of Disposal Facility

After the trailers were loaded, EAI was notified that the designated disposal facility, Clean Harbors Aragonite, Utah, was closing for routine maintenance. The waste had to be redirected to alternate Clean Harbors facilities located in Kimball, Nebraska and El Dorado, Arkansas.

Multi-Incremental Soil Sampling

Once the ground cover was removed, no obvious signs of spills or leakage from the containers were observed on the ground. The multi-incremental soil sampling over the entire site was no longer necessary.

PROJECT ORGANIZATION, COORDINATION, SCHEDULE AND COSTS

Project Organization

SAN LLC retained EAI on behalf of PPMI to prepare the TCRAP and to oversee container removal, disposal and cleanup of this site. The EPA Coeur d'Alene Field Office provided regulatory oversight for the project. EAI coordinated with multiple transporters and disposal facility to complete tasks outlined in the scope of work.

EAI also retained the following subcontractors for various tasks associated with the TCRAP execution:

- TTT Environmental Instruments and Supplies (Anchorage, AK) to provide air monitoring pumps and sample media
- SGS Environmental Laboratories (Anchorage, AK) to provide chemical analysis of water, soil and various waste streams stored in the containers on site
- BGES Environmental Consultants (Anchorage, AK) to provide third party verification and review of analytical data
- NVL Lab (Seattle, WA) to provide analytical data for air monitoring sample media
- Emerald Services, Inc. (Tacoma, WA) to provide disposal services for approved waste streams as indicated on manifests
- US Ecology Idaho, Inc. (Grandview, ID) to provide disposal services for approved waste streams as indicated on manifests
- Clean Harbors (Aragonite, UT) to provide disposal services for approved waste streams as indicated on manifests (This subcontractor was not used due to the facility closure for routine maintenance)
- Clean Harbors (Kimball, NE) to provide disposal services for approved waste streams as indicated on manifests
- Clean Harbors (El Dorado, AR) to provide disposal services for approved waste streams as indicated on manifests

Project Coordination

Communication between EAI and the SAN LLC owners, Bruce Chambers and Jay Sutherland, remained open and constant from the point of the EPA investigation in November 2010 to present day.

After the TCRAP was approved, organizational meetings were held prior to the start of the project and onsite meetings were conducted daily once work commenced. Discussions in the meetings included a review of the TCRAP and any clarification needed with the plan or project. Each day prior to work commencing, meetings were held to discuss the day's goals and any issues and solutions.

Project Schedule

Task Name	Task Description	Projected days on TCRAP	Actual Timeframe
Site characterization of drums and sample collection	Drum/container opening, visual identification and verification based upon MSDS's and manufacturer labeling; field screening utilizing Clor-D-Tect and HAZCAT testing; sampling of unknown containers	7-10 days	August 1- 5, 2011
Laboratory analysis and data verification	TCLP metals, TCLP VOC, and ignitability	21-45 days	August 1-September 12, 2011
WPQ preparation and approval	Profile preparation and submittal	2-3 days	September 7-9, 2011
Disposal facility WPQ approval	Disposal facility WPQ approval	5-7 days	September 12-15, 2011
Shipping documents	Shipping documentation preparation once WPQ approval has been received	1-2 days	September 14-15, 2011
Preparation for drum removal	Preparation for offsite transportation including: re-packaging and/or over packing, marking and labeling drums and containers	5-7 days	August 10-12, 2011 September 13-15, 2011
Drum & trailer removal	Loading shipping containers for transport to final disposal facility and offsite removal	4-6 days	September 19-29, 2011**

**** Trailer removal was delayed awaiting the Continued Verification Approvals for Clean Harbors Facilities located in Region 6 and 7.**

Project Costs

The total cost associated with activities in the TCRAP was \$380,877.86.

REMOVAL ACTIVITIES

Site Description

The site is described as being an outside fenced area with a 12-inch containment wall consisting of railroad ties and a lining made with heavy poly liner material. This area was constructed to provide secondary containment for all containers being stored onsite. The containers were in varying conditions due to exposure. No drums were leaking, but several drums were bulging from being frozen and thawed several times over the years. The 250-gallon bulk containers were in good condition but were missing valve covers. Most of the 5-gallon containers were in good condition; however, a few had cracked, broken, and caved-in lids. Soil outside the containment area had some spots of staining due to the various motorized equipment that had previously been stored at the site.

In the northwest corner of the site, another small containment area had been added for housing five 55-gallon drums. The purpose was to catch the rainwater that was being pumped off the containment area from the heavy rains. The rainwater was analyzed for TCLP metals as well as total VOCs with the results showing no contaminants present.

Clean Up Activities

Characterization

All containers needed to be characterized and approved for disposal before any movement of them could be initiated and on August 1, 2011, the site team started the process. The first task was to open all the drums, identify the contents, sample as needed, and determine the condition of each container for transportation. This activity was completed on August 5, 2011. (Attachment 2, Pic.5)

Over Packing

During August 10th-12th and September 13th-14th, 280 each 55-gallon drums were packaged into 85-gallon open top steel drums and nine each 85-gallon drums were over packed into 110-gallon open top steel drums. (Attachment 2, Pic.6,7,8)

Drum Preparation and Trailer Loading

Drums were marked and labeled on September 15, 2011 in preparation for trailer loading which would begin on September 19th. Five each 53-foot trailers were staged throughout the week to be loaded with the last drum being loaded on September 23rd, 2011. None of the placarded trailers left the site area until disposal facilities' final approvals were obtained. (Attachment 2, Pic.10,11,12,13,14)

Final Site Cleanup and Inspection

The final step of the cleanup occurred once all the drums were secured in the trailers. The secondary containment area was disassembled and rolled into a manageable size. SAN LLC took possession of the timbers and liner material.

EPA OSC, Bob Whittier, inspected the site for any spills or leaks that may have occurred from the containers while they were stored on the property. No spills or leakage of any waste on the ground surface was observed, and therefore no multi-incremental soil sampling was determined to be necessary at the site. (Attachment 2, Pic.9)

It was requested that a composite sample be taken of all stained areas where the motorized equipment had been stored. The same analyses that were performed on the drums, as well as testing for DRO/RRO and GRO, were to be run on these samples. The results confirmed that the soil was contaminated with diesel fuel.

Unexpected Occurrences

No instances outside the scope of work were encountered during the execution of the TCRAP.

Post Removal Site Controls

No controls were put in place after container removal.

WASTE MANAGEMENT, TRANSPORTATION AND DISPOSAL ACTIVITY

Summary of Waste Removed from Site

WASTE STREAM	Profile Number	POUNDS	Disposal Facility
Highway Paint	41445	53,690	Emerald Services
Highway Paint (5-gallon)	41445	2,258	Emerald Services
Highway Paint (250-gallon tote)	41445	2,258	Emerald Services
Paint Slops	41479	51,738	Emerald Services
Used Oil	41458	5,079	Emerald Services
Toluene	41451	400	Emerald Services
Contact Cement (5-gallon)	41459	2,788	Emerald Services
Axel Grease (2 ea 15-gallon drums)	41457	245	Emerald Services
Hydraulic Fluid	41452	350	Emerald Services
Antifreeze/ Oil	41453	1,050	Emerald Services
Antifreeze	41454	1,000	Emerald Services
Dura Set Part A	41467	26,153	Emerald Services
Citrus Cleaner	CH522642	650	Clean Harbors-Kimball
Oil contaminated with Paint	CH523376	2,900	Clean Harbors-Kimball
Oil contaminated with Paint (250-gallon)	CH523376	2,600	Clean Harbors-Kimball
Dura Set Part B	CH523109	24,218	Clean Harbors-El Dorado
Aerosol (5-gallon with 4 cans)	CH524431	20	Clean Harbors-El Dorado
Latex Paint (5-gallon)	15165	4,300	US Ecology Idaho Inc.
Dirt, Leaves, Debris	26673	10,350	US Ecology Idaho Inc.
PPE	26997	1,200	US Ecology Idaho Inc.
Paint Chips with Water	26667	3,250	US Ecology Idaho Inc.
Highway Reflective Spheres	26668	1,300	US Ecology Idaho Inc.
POL Soil (85-gallon)	26175	2,900	US Ecology Idaho Inc.
TOTAL		200,697	

Transportation

A total of 200,697 pounds of hazardous waste material was removed from 200 North Post Road site and shipped to multiple disposal facilities located within the continental United States. Shipping waste from Anchorage, Alaska to disposal facilities located within the continental United States required both highway and marine transportation.

Weaver Brothers Inc. provided highway transportation services from 200 Post Road to the Port of Anchorage. Upon arrival at the Port of Anchorage, Totem Ocean Trailer Express took possession of the waste and provided marine transportation from the Port of Anchorage through the Gulf of Alaska to the Port of Tacoma located in Tacoma WA. Once the trailers arrived at the Port of Tacoma, Emerald Services, Inc. (ESI) took custody of the trailers and transported them via highway to its Tacoma, WA

facility. Upon arrival at the ESI Tacoma facility, all waste manifested to ESI's facility were formally checked in as received. All waste not manifested into ESI was managed through ESI's 10-day transfer facility, reloaded and transported via highway to final disposal facilities located in Grandview Idaho, Kimball, Nebraska and El Dorado, Arkansas.

All waste containers and transport vehicles were packaged, marked, labeled, and placarded in accordance with Federal Regulations. (Attachment 2, Pic.10, 11, 12, 13, 14)

SAMPLING AND MONITORING ACTIVITIES

Sampling

Sampling was completed on the rainwater collection drums; the analysis consisted of TCLP metals and total VOCs. The results were ND (Non-detectable) for all tested analytes.

Samples were taken from the various containers that could not be characterized by product labels, MSDS or by field screening. The drums were tested for TCLP metals, total VOCs, ignitability and pH as applicable to the matrix. The results from the drum samples revealed that one drum had mercury levels over RCRA limits, and flash points ranged from less than 70 degrees to greater than 200 degrees Fahrenheit. Total volatile results were not definitive due to the high volatile contents. Material Safety Data Sheets were used as the primary means to profile the waste into the disposal facilities.

A composite soil sample was taken from stained areas after the site was cleared of all waste containers and ground covers. The soil was tested for TCLP metals, total VOCs, ignitability, DRO/RRO and GRO. The soil results showed high levels of DRO which is indicative of diesel fuel contamination.

Sample results are in Attachment 6.

Monitoring

The exposure potential by airborne toxic contaminants was extremely small given the mixtures were likely to contain less than 10% of the Occupational Exposure Limit for each chemical. The risk for overexposure was also very low as worker exposure could not exceed Permissible Exposure Limits (PEL) for any of the known chemicals onsite.

To verify that exposures stayed within the PEL at all times, continuous air and personal exposure monitoring was performed while sampling work was completed by EAI personnel. EAI monitored for the following hazardous chemicals while performing sampling/characterization work at the Post Road site:

Hazardous Substance	Air Sampling Equipment
Benzene	UltraRAE with RAE-Sep benzene separation tubes
Methanol	MiniRAE 2000 PID
Toluene	MiniRAE 2000 PID
Lead	Personal air monitor with sampling pump and 37mm lead filter cassette
Hexavalent Chromium	Personal air monitor with sampling pump and 37mm hexavalent chromium filter cassette

The continuous air and personal exposure monitoring results are listed in Attachment 3. One atypical occurrence happened while monitoring for lead with the personal air monitor and sampling pump. In this instance the filter cassette detached from an EAI employee's sampling tube and pump. EAI Health and Safety reconnected the cassette to the tube and pump in order to continue monitoring for lead. No other unexpected occurrences happened while performing sampling/characterization work for the Post Road project. (Attachment 7)

QUALITY ASSURANCE/QUALITY CONTROL

All samples analyzed by SGS Environmental Laboratories (SGS) were within the quality assurance/quality control standards set forth by the EPA, the SGS Quality Assurance Program Plan and the National Accreditation Conference.

Data was third-party reviewed by Brian Braunstein of BGES, Inc. It was determined that the results were usable in waste determinations regarding whether the waste was regulated under RCRA criteria and which disposal methods would be most appropriate. (Attachment 2)

COMMUNITY RELATIONS

The businesses in the immediate area were made aware of the cleanup and drum removal activities that were occurring at the Post Road Site.

HEALTH AND SAFETY

No health and safety conflicts were encountered during the removal action at 200 North Post Road.

HIGHLIGHTS AND DIFFICULTIES

Highlights

A highlight for the site work includes the execution of the TCRAP with no health and safety incidents. The work was also done within the scheduled timeframe as outlined in Project Schedule of Tasks in the TCRAP.

Difficulties

No difficulties were encountered during the execution of the TCRAP. After the trailers were loaded, EAI was notified of the temporary closure of the Clean Harbors facility in Aragonite, Utah. The Aragonite temporary facility closure resulted in a redirection of waste to alternative disposal facilities. A minor delay occurred while waiting for alternate facility disposal approvals, and Continued Verification Approvals from EPA Region's 6 and 7

SUMMARY

200 North Post Road site has had numerous tenants with a variety of business types occupying the space. In 2006, PPMI, a company that specializes in highway striping, moved into the outdoor storage lot to store pieces of equipment and paint products. In 2010 EPA received a complaint which resulted in an EPA investigation. As a results of the investigation included the following:

The lot stored over 400 drums, 5-gallon containers and 250-gallon bulk containers. In June 2011, EAI was hired by SAN LLC to write the TCRAP and oversee the characterization, identification and removal of all the containers off the site.

On, August 1st the work to identify and sample the contents of the drums started; this portion of the work concluded on August 5th. The drums were typical of what you would expect from a highway stripe painting operation.

Samples were submitted to SGS, an environmental laboratory located in Anchorage. The results showed one drum that contained mercury above regulatory limits and flash points that ranged from <70 to > 200 degrees Fahrenheit. Total volatile results were not definitive due to the high volatile contents. Material Safety Data Sheets were used as the primary means to profile the waste into the disposal facilities.

The two hundred and eighty-nine drums that were not suitable for transportation were over packed into 85-gallon and 110-gallon open top steel drums during the timeframe of August 10th-12th and September 12th-14th.

Drum removal from the site started on September 19th. A team loaded five each 53-foot trailers with all the containers from the site. Waste removed from the site weighed 200,697 pounds. The trailers were transported offsite on September 29th once the approvals were received.

The overall objective of having no waste containers left onsite was accomplished. All containers identified within the TCRAP were removed from the site and transported to EPA approved disposal facilities. EPA OSC, Bob Whittier, confirmed the goal was accomplished during the final walk-through on September 29, 2011. (Attachment 1, Pic.15)



Aerial view of site Prior to Clean Up Activities @ 200 Post Road, Anchorage, Alaska

(Pic .1)



Site View NE (Pic. 2)



Site View SE (Pic.3)



Donning the Air Monitoring Equipment
(Pic.4)



Sampling the Containers (Pic.5)



Over Packing of Drums

(Pic.6)



Over Packing Activities

(Pic.7)



Over Packed Drums (Pic.8)



Ground Cover Removal (Pic.9)



Placarded Trailer #1

(Pic.10)



Placarded trailer #2

(Pic.11)



Placarded trailer #3

(Pic.12)



Placarded Trailer #4

(Pic.13)



Placarded Trailer #5

(Pic.14)



Finished Site @200 Post Road, Anchorage , Alaska

(Pic.15)