

Attachment 3



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, ALASKA
P.O. BOX 6898
ELMENDORF AFB, ALASKA 99506-6898

SEP 11 2003

Regulatory Branch
South Section
8-2003-1037

Mr. Michael Soltis Environmental Engineer
Shannon and Wilson Incorporated
5430 Fairbanks Street, Suite 3
Anchorage, Alaska 99518-1263

Dear Mr. Soltis:

This is in response to your September 03, 2003, letter requesting a Department of the Army (DA) jurisdictional determination. Located within section 8, T. 17 N., R. 2 E., Seward Meridian, near Palmer, Alaska.

Based on our review of the information you furnished and available to our office and our on site field inspection on September 04, 2003, we have determined that your proposed project would not placement of dredged and/or fill material into waters of the United States (U.S.) under our regulatory jurisdiction. Therefore, a DA permit is not required.

However, should you decide to alter the method, scope, or location of your proposed activity, please contact this office for a determination of DA jurisdiction and, if applicable, the required DA authorization.

Your proposed project was reviewed pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. Section 10 of the Rivers and Harbors Act requires that a DA permit be obtained for certain structures or work in or affecting navigable waters of the U.S., prior to conducting the work (33 U.S.C. 403). Section 404 of the Clean Water Act requires that a DA permit be obtained for the placement or discharge of dredged and/or fill material into waters of the U.S., including wetlands, prior to conducting the work (33 U.S.C. 1344).

For regulatory purposes, the Corps of Engineers defines wetlands as those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Navigable waters of the U.S. are those waters subject to the ebb and flow of the tide shoreward to the mean high water mark, and/or other waters identified as navigable by the Alaska District.

Please be advised that land clearing operations involving vegetation removal with mechanized equipment such as front-end loaders, backhoes, or bulldozers with sheer blades, rakes, or discs in wetlands; or windrowing of vegetation, land leveling, or other soil disturbances are considered placement of fill material under our jurisdiction.

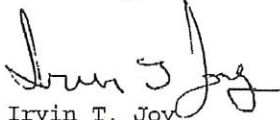
This approved jurisdictional determination is valid for a period of five (5) years from the date of this letter, unless new information supporting a revision is provided to this office before the expiration date. Should you desire to appeal this approved jurisdictional determination, please contact this office to request additional information on the Administrative Appeals Process.

Nothing in this letter shall be construed as excusing you from compliance with other Federal, State, or local statutes, ordinances, or regulations that may affect this work. For informational purposes, a copy of this letter is being sent to the agencies and individuals on the enclosed list.

Please take a moment to complete and return the enclosed questionnaire. Our interest is to see how we can continue to improve our service to you, our customer, and how best to achieve these improvements. Upon your request, you may also provide additional comments by telephone or a meeting. We appreciate your efforts and interest in evaluating the Regulatory Program.

We appreciate your cooperation with the Corps of Engineers' Regulatory Program. Please refer to file number 8- in future correspondence or if you have any questions concerning this determination. You may contact me at (907) 753-2712, toll free from within Alaska at (800) 478-2712, or by mail at the letterhead address, ATTN: CEPOA-CO-R-S.

Sincerely,



Irvin T. Joy
Project Manager

Enclosures

Copies Furnished:

Mr. Tim Rumpfelt
Alaska Department of Environmental
Conservation
555 Cordova Street
Anchorage, Alaska 99501-2617

Office of Habitat Management & Permitting
Alaska Department of Natural Resources
333 Raspberry Road
Anchorage, AK 99518-1599

Project Coordinator
Department of Natural Resources
Office of Project Management and Permitting
Alaska Coastal Zone Management
550 West 7th Avenue, Suite 1660
Anchorage, Alaska 99501-3568

Ms. Ann Rappoport
Field Supervisor
U.S. Fish and Wildlife Service
Ecological Service Anchorage
605 West 4th Avenue, Room 62
Anchorage, Alaska 99501-2249

Supervisor
Western Alaska Ecological
National Marine Fisheries Service
222 West Seventh Avenue, # 43
Anchorage, Alaska 99513-7577

Ms. Judith Bittner
Department of Natural Resources
State Historic Preservation Office
550 W. 7th Avenue, Suite 1310
Anchorage, Alaska 99501-3565

Mr. Richard B. Thompson
State of Alaska
Department of Natural Resources
Division of Land
550 W. 7th Avenue, Suite 900C
Anchorage, Alaska 99501-3
577

Mr. Gary Prokosch
State of Alaska
Department of Natural Resources
Division of Water
550 W. 7th Avenue, Suite 900A
Anchorage, Alaska 99501-3577

Ms. Robin Willis
Statewide Services
Alaska Department of Fish and Game
333 Raspberry Road
Anchorage, Alaska 99518-1599

Alaska Operations Office
Environmental Protection Agency
222 West Seventh Avenue, # 19
Anchorage, Alaska 99513-7588

Kenai River Center
514 Funny River Road



National Wetlands Inventory

U.S. Fish and Wildlife Service

550 Rebarcheck Ave, Palmer, AK



April 2, 2024

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland
-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond
-  Lake
-  Other
-  Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Attachment 4



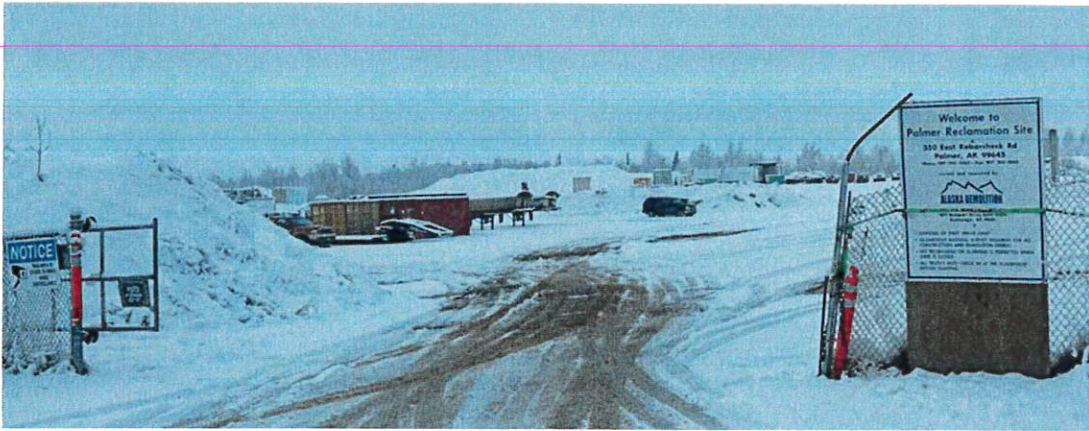
ALASKA DEMOLITION

Specializing in Demolition & Environmental Services
2817 Rampart Dr. Anchorage, Alaska 99501
907-274-DEMO (3366) www.alaskademolition.com
Palmer Reclamation Site
550 Rebarcheck Ave, Palmer, Alaska 99645

Operations Plan

1- Access Control-

- (a) Access to the existing site consists of (2) roads, both of which are controlled through the use of gates. The primary access is located off Rebarcheck Road at the western edge of the north boundary and is equipped with an electric sliding gate. The secondary gate is located off Rebarcheck Road at the eastern edge of the north boundary and is equipped with a chain-link double-width gate secured using a chain and padlock.



- (b) A soil/gravel berm is constructed around the perimeter of approximately 95+% of the site and averages 10 to 14 feet in height. This also acts to channel the surface around the site into ditches/culverts where it is diverted into a drainage/infiltration area. Where the berm is accessible from roads a 3-strand barbed wire fence has been installed to deter off-road vehicle access. As the existing was developed for use by Alaska Demolition the signage at the primary gate identifies that it is a private fill area, lists prohibited items, and that hours of operation are by appointment only.





- (c) Safe vehicle traffic is controlled on-site through access points and roads. The roads are graded/compacted to allow for easy ingress/egress and to minimize the rutting that may cause a load to shift. Road/access maintenance is performed as necessary. As roadways adjust to the landscape of the fill site activities signage and other demarcation are used to provide directions to those operating onsite.
- (d) Prohibited activities are controlled by utilizing yearly site improvements, using gates, berms, and fencing. Access into the site is limited and is designed to prevent issues with unauthorized use or illegal access by others wishing to use the site for personal use target practice or off-road motorized vehicles, which are prohibited activities.

2- Waste Acceptance and Handling Policy

- (a) The monofil is used primarily for waste generated during Alaska Demolition projects. Alaska Demolition requires that a Hazardous Building Materials Survey be conducted by an Asbestos Hazard Emergency Response Act (AHERA) certified building inspector, and analysis by a certified laboratory to ensure that identification of any asbestos-containing materials (ACM) or other hazardous materials in the structure have been removed prior to demolition activities. If analysis for lead concentration exceeds 400mg/kg the debris will not be accepted at PRS. Other documentation may be requested to ensure that other hazardous materials have been packaged, labeled, and transported to an approved disposal/recycle location and are not being disposed of at PRS. Failure to properly identify, remove, and dispose of ACM or Hazardous Materials that can expose Alaska Demolition workers and/or the public to asbestos fibers and hazardous materials have civil, criminal, and regulatory liability, and the appropriate regulatory agency will be contacted immediately. All Waste Acceptance Forms, building surveys, and analysis will be electronically scanned in and available for review.
- (b) Should Alaska Demolition allow others to dispose of at the monofil site, they also must provide a Palmer Reclamation Site Acceptance Criteria and Disposal Authorization form, (Attachment No.1) Hazardous Material Survey, and Laboratory Analysis documentation showing that no prohibited materials are present in their loads. All third-party approved disposals at PRS are required to schedule an approved date and time window when approved acceptance of debris will be received at the PRS facility.
- (c) Alaska Demolition employees working at the monofil site are certified by the State of Alaska under the Asbestos Worker program and are also certified 40-hour HazWoper workers. This enhances the disposal process as they are more able to identify items that are prohibited. Should items be identified that are prohibited, they will be immediately assessed for handling requirements, packaged, labeled, and transported off-site to an approved disposal location.



- (d) Alaska Demolition Palmer Reclamation Site prohibited materials, hazardous material, or other wastes that may cause a potential hazard to human health or the environment, which are prohibited items and require special handling and disposal methods under federal, state, and local regulations/laws. List of some of the prohibited items that cannot be disposed of at PRS.
- Lead-based paint.
 - Lead pipe and solder.
 - Florescent tubes and bulbs
 - Mercury switches and thermostats
 - Paints, solvent, or pesticides
 - PCB-containing transformers or light ballasts
 - PCB-containing paint or caulking
 - Radionuclide-containing smoke detectors and exit signs.
 - Refrigerants from air conditioning units or appliances
 - Electronic wastes
 - Grass clippings
 - Vehicles (tires)
- (e) Alaska Demolition utilization of a Mettler Toledo LYNX truck scale, certified by the State of Alaska Division of Measurement Standards and Commercial Vehicle Compliance: Registration Number: 2401-050566.
- (f) There is a sign located on the fence at the primary entrance to the monofil that identifies Alaska Demolition as the owner, that this is a private fill site, operational hours are by appointment only, and a listing of prohibited items for disposal.





- (g) Waste materials received for disposal are mechanically separated by an excavator as necessary. Waste materials such as scrap iron, steel, aluminum, copper, or other materials are removed and set aside for subsequent collection and transportation to a Recycling Center and their storage locations are shown on figure 1. Any salvage practices performed by Alaska Demolition will not interfere with the facility's operation, create a safety hazard, or cause pollution. Alaska Demolition ships out copper loads one to two times per year, and pending metal pricing and barging availability once a year.

3- Waste Placement Plan

- (a) As indicated in historical records and current site figures, the site is an existing gravel pit excavated to a level approximately 50 feet below the ground surface. The plan is to fill the excavation and provide a final site condition that gently drains surface water from a crown in the center to the perimeter of the property. Construction & Demolition (C&D) waste accepted at the facility will be directed to different areas within the site depending on the waste constituents. ~~The western area of the monofil will be designated for the disposal of "General" C & D waste, including gypsum, scrap lumber, Styrofoam, roofing, carpet, cardboard, and insulation; and non-regulated asbestos-containing materials (ACM). The western area of the monofil is located such that it is beyond 500 feet from the nearest drinking water well and will maintain the regulatory separation requirement. The eastern area of the monofil is designated for the disposal of only "Exempt" C&D waste including land clearing waste (excavated soil, rock soil, tree limbs, butt ends, stumps, or other foliage) Portland cement concrete and associated rebar that can't easily be removed and crushed glass from windows from demolition of residential and commercial structures. (television tubes, fluorescent light tubes, or computer monitors are prohibited items for disposal at the monofil. These items are removed prior to demolition and disposed/recycled at local permitted facilities). Both the "exempt" and "general C&D operations are being placed starting at the northern monofil boundary and are extending south as materials are being disposed of. The waste materials will be graded and compacted with a slope to prevent standing water on the monofil surface.~~

The C&D waste and cover material will be placed during each stage of construction and will be graded and compacted to prevent water from ponding on the monofil surface. Extra care will be taken when placing C&D that has an asbestos constituent to ensure that equipment does not come directly in contact with the C&D materials. A water truck is available on site to mitigate dust that may be generated from the fill operation. When the fill in the excavation reaches capacity, the final layers will be placed, graded, and compacted with a "crown" that slopes to the edges of the site and allows surface water to flow to the perimeter of the property.



- (b) As C&D waste is deposited in the monofil it will be placed in lifts of 8 to 10 feet starting at the bottom of the excavation. Upon completion of the base lift, operations will be on top preceding lift where another lift will be placed, etc. Each new lift will leave an approximate 20-foot band around the preceding lift perimeter for use as an equipment access route. This process will continue until the ground surface elevation is reached.
- (c) Unstable slopes will be avoided by placing C&D waste in 8 to 10 lifts and allowing for the 20-foot access band on the proceeding lift. This will reduce the potential for instability and provide a safe working area around the face.

4- Waste cover plan

- (a) Each completed cell and non-regulated ACM will be covered using Intermediate Cover Material (ICM). Suitable cover material will be obtained from what is imported from others, as well as what is produced from on-site facility land clearing or excavation projects. ICM material will generally consist of 'unclassified fill material'. Unclassified fill material is a common description in civil works for material that doesn't meet a structural specification and therefore has little value. It generally consists of higher silt and the resulting gradations prevent suitable compaction for civil works such as road building. As a result, this material classification has widespread acceptance as a great beneficial reuse for general fill and cover applications. AK Demo / PRS operations excavate a new cell and stockpile the ICM.
 - Factors determining the siting and design of stockpiles at PRS.
 - Quarried materials that are stockpiled are not compact and are stored adjacent to the open "fill" face of the monofil.
 - Quarried materials will be placed on a firm and provide a stable foundation and properly drained and will not be affected by water/rainwater.
 - Quarried materials: the size of the area will not affect the mobility of equipment to operate the receiving of C&D debris. Non-RACM will be covered within 24 hours of being received.
 - General debris is covered on average 3 to 4 days, the leading edge/monofil face/lift or unless weather conditions demand liter control.
 - No quarried materials will be stockpiled under or near any power lines or other utilities, or located where high wind conditions may occur.
- (b) Only the active C&D disposal cells will be left uncovered during the monofil construction and operations. No materials are to be left uncovered for longer than 90 days, and non-regulated ACM will be covered within 24 hours. If a temporary or seasonal shutdown is to occur for more than 90 days, at least 1 foot of cover material will be placed and compacted within seven days after waste is last deposited.
- (c) ICM cover material will consist of at least 1 foot or greater. The placement of the final cover material is detailed in Section 10 of the 2024 permit application.



5- Non-RACM Waste Placement Plan

- (a) The procedure for screening and identifying unacceptable materials in Section 2(a) is applied to RACM and non-RACM. AK Demo Site Superintendent is a 40-hour Asbestos Abatement Supervisor, Contractor, and Worker Trained and an Alaska Department of Labor, Asbestos Abatement Certificate of Fitness.
- (b) The site superintendent is provided with job details of materials being received at PRS. Those loads identified as non-RACM are visually inspected by a qualified person prior to emptying waste from loads being received and all required documentation, building surveys, analysis, and approved PRS Waste Acceptance Form. If the material is found to be crushed or crumbled to a point that it could be rendered airborne releasing fiber, the materials will be considered RACM. The load is segregated, wetted (utilizing an on-site water truck), and rejected. AK Demo asbestos trained, and current Department of Labor registered workers will repackage into 6 mil plastic bags and dispose of at the Municipality of Anchorage Solid Waste Services Hiland Landfill after a waste acceptance form is completed, approved, and scheduled. This will be completed at the customer's expense if the materials are from a third party.
- (c) Non-RACM will be placed into landfill in a manner to mitigate the generation of dust and be protected from becoming friable during handling or placement. Upon placement of non-RACM, it will be covered with a minimum of 1 foot of soil. Compaction will not occur until a minimum of 6 inches of cover material is achieved. Non-RACM will be covered within 24 hours of placement.
- (d) See sections 4 & 5 for details of placement, frequency, and cover material type.

6- Surface & Storm Water Control Plan

- (a) Run-off from the facility is controlled by existing topography, as well as site certain site improvements that are typical for controlling surface and stormwater run-off. Historically the site was a former gravel pit, therefore, the existing topography encourages drainage to remain onsite. Additional controls include those found in figures 1-7 of the 2019 permit application. This includes drainage ways, perimeter berms, daily site grading practices, etc.

Other operation, procedural, and administrative policies to limit runoff and to encourage infiltration onsite include:

- Routine monthly inspection of the site
- Annual stormwater training for PRS provided by a qualified person.
- Heightened attention is given to grading and 'crowning' as slopes towards the edge of the monofil as excavations reach capacity and begin to reach final elevations.
- Vegetative buffers and vegetation of completed cells.



Note: It has been determined that this facility doesn't meet the criteria that require a Stormwater pollution and prevention plan (SWPPP). A review of the SWPPP applicability was conducted by Shannon & Wilson and a copy of that letter is included with the 2019 re-certification and Attachment No. 2.

Run-on from outside the property boundary is prevented in many areas because they are at lower elevations than the facility. Additionally, perimeter berms prevent unwanted run-offs. The only identifiable run-on that occurs is periodic through a culvert that was approved as a control measure in the original facility construction. Grading and existing berms control the point of run-on to this culvert for the applicable waters.

7- Litter, Vector, and Nuisance Control

- (a) Alaska Demolition does not accept any commercial food waste, household garbage or grass clippings as they are prohibited items. Because no food-based wastes are accepted, problems with wild and/or domestic animals have not been a problem.
- (b) The use of a water truck on-site to control dust and potential hot spots. Because no food wastes are accepted, odor and disease vectors have not been an issue. Orders have been noticed in the past, AK Demo PRS Site Superintendent has and will cover with additional ICM material any open visible cracks within the capped area to eliminate orders and/or visual steam. Berms around to the site and compliance with the City of Palmer work hours combined to limit any potential noise issues. Should litter due to wind or other factors occur, Alaska Demolition will hand-pick all blown debris/litter to prevent it from leaving the site.

8- Corrective Action Plan

Should inspections or routine operations identify any potential violations of the permit then actions will be taken to correct the issues. Any known permit violations will be reported in accordance with the conditions of the permit. This applies to the following:

- (a) Cleaning up any improper or unauthorized waste.
 - PRS Waste Acceptance Form, Building Surveys, and Analysis Requirements.
 - Improper/Unauthorized waste once identified, will be containerized, sampled, profiled and disposed of at the appropriate facility.
- (b) Repairing any damage to the facility or structures
- (c) Violations of regulations or permit conditions.
 - AK Demo will self-report to the ADEC and City of Palmer if any violations are noted.
- (d) Responding to combustion or a fire within the waste.
 - AK Demo will utilize a water truck and cover hot spot areas with additional fill.



9- Operator Training

(a) All monofil personnel responsible for handling waste will be trained to recognize potentially hazardous waste materials and will be required to be familiar with the physical characteristics of the work site. Heavy equipment operators will be properly trained in the use of their equipment and for the proper placement and compaction of the waste material. Additionally, the PRS supervisor will be trained in monofil operations, will oversee the daily and long-term fill operations, and will be responsible for implementing the provisions of this permit and CUP.

(b) Training completed by a qualified person and will be documented. This documentation will be maintained with the operating record along with applicable training certificates such as HAZWOPER or Asbestos certifications will be kept with the operating record.

10- Operating Record

An operating record for the PRS facility and maintained in the scale house located at the site and electronic copies are readily available for ADEC personnel.

- ADEC Permit
- City of Palmer Conditional Use Permit
- Yearly CUP facility (Geological Survey)
- PRS Monthly Inspection Reports
- PRS Waste Acceptance Forms
- Building Surveys
- Analysis Reports from third-party laboratories



Attachment No. 1



ALASKA DEMOLITION LLC.
 PRS: PALMER RECLAMATION SITE
 ACCEPTANCE CRITERIA AND
 DISPOSAL AUTHORIZATION FORM

| | | | | | |
|---|--|--------------------------|-----|--------------------------|-----------------|
| TYPE OF REQUEST (CHECK ONE) | | <input type="checkbox"/> | NEW | <input type="checkbox"/> | EXTENSION |
| REQUESTER INFORMATION: | | | | | |
| COMPANY: | | | | | DATE: |
| ADDRESS: | | | | | |
| PHONE: | | FAX: | | EMAIL: | |
| POINT OF CONTACT: | | | | | |
| PROJECT INFORMATION: | | | | | |
| NAME: | | | | | PROJECT NUMBER: |
| LOCATION: | | | | | |
| ADDRESS: | | | | | |
| OWNER: | | | | | PHONE: |
| MATERIAL: | | | | | |
| EST. QUANTITY: (CUBIC YARDS) | | | | | |
| REQUESTED AUTH. DATES: | | | | | |
| HAZARDOUS MATERIAL SURVEY ATTACHED: | | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| LABORATORY ANALYSIS ATTACHED: | | <input type="checkbox"/> | YES | <input type="checkbox"/> | NO |
| THIS SECTION TO BE COMPLETED BY ALASKA DEMOLITION / PALMER RECLAMATION SITE: | | | | | |
| <input type="checkbox"/> | | APPROVED | | <input type="checkbox"/> | |
| <input type="checkbox"/> | | DECLINED | | | |
| AUTHORIZATION: | | | | | |
| BY: | | | | | DATE: |
| COMMENTS: | | | | | |
| PRS LOCATION DISCARDED: | | | | | |

The pre-acceptance protocol has been designed to ensure that only Non-Hazardous, Non-Regulated soil, Construction Debris, Demolition Debris and accepted ACM material can be disposed of by Alaska Demolition Palmer Reclamation Site are approved for receipt at the PRS facility.

By signing below, you are certifying that the material being shipped, transported or received at Alaska Demolition Palmer Reclamation Site are Non-Regulated Materials.

Printed Name: _____

Date: _____

Signature: _____

Company: _____



Attachment No. 2



SEATTLE
RECLAMATION
PORTLAND
FAIRBANKS
ANCHORAGE
DENVER
SAINT LOUIS

June 11, 2007

Alaska Demolition LLC
2903 Tanglewood Drive
Anchorage, Alaska 99517

Attn: Mr. Justin Green

**RE: STORM WATER PLAN REQUIREMENT, PRS INERT WASTE MONOFILL
PALMER, ALASKA**

This letter has been prepared by Shannon & Wilson Inc. (S&W) to address the applicability of storm water regulations under the National Pollutant Discharge Elimination System (NPDES) regulations for site activities at the Palmer Reclamation Site (PRS) inert waste monofill. Specifically, the document addresses the need for a Storm Water Pollution and Prevention Plan (SWPPP) under the NPDES regulations.

REGULATORY REQUIREMENTS FOR STORMWATER PLANS

The PRS facility is an inert waste monofill that is contained within a pre-existing quarry. Facility activities are permitted by the City of Palmer Planning and Zoning Commission Conditional Use Permit for Tax Parcel 17N02E08D008. The Conditional Use Permit requires under *Other Conditions*, Item #12 that "A storm water plan which meets applicable state law shall be prepared and implemented as approved."

Alaska state law regulates storm water management under the Environmental Protection Agency's (EPA) Clean Water Act and NPDES regulations. A SWPPP would be required for a NPDES storm water discharge permit, if such a permit was required for the PRS facility. The SWPPP serves to describe the potential sources of pollution that could enter storm water discharges, controls to retain sediment and remove pollutants, and other storm water management practices to protect water quality of receiving waters. However, the EPA states that "An industrial facility requires (NPDES) permit coverage for its storm water discharges under two conditions: 1) the runoff enters waters of the United States or enters a municipal separate storm sewer system before draining to waters of the U.S., and 2) the facility conducts an industrial activity as defined in the regulations (the Code of Federal Regulations at 40 CFR 122.26(b)(14)(i)-(xi))." A copy of the EPA Industrial Permitting Decision Tree is attached.

5430 FAIRBANKS STREET - SUITE 3
ANCHORAGE, ALASKA 99518
907-561-2120 FAX 907-561-4483

32-1-16736



PRS Storm Water Plan Assessment
June 11, 2007
Page 2

SHANNON & WILSON, INC.

Mr. Nathan Patry of the Alaska Department of Environmental Conservation (ADEC) Division of Water was contacted on April 30, 2007 regarding the need for a SWPPP for the PRS facility. Mr. Patry indicated that if the storm water from the facility activities is captured on-site and allowed to evaporate, infiltrate the ground surface, or is used for irrigation, coverage under the NPDES permit is generally not necessary. In this circumstance, development and implementation of a SWPPP would not be required.

OVERVIEW OF SITE DRAINAGE CHARACTERISTICS

The PRS inert waste monofill is contained within a pre-existing quarry. The facility's industrial activities are conducted entirely within the existing excavation, at a lower elevation than the local surface grade. Accordingly, storm water within the monofill is contained entirely on-site, with negligible potential for runoff or other off-site conveyance. In accordance with the site's solid waste disposal permit, the fill area was evaluated for potential to accumulate standing water. Through the initial 1 to 1.5 years of operation, permanent ponded water was not observed by the on-site operators, or by occasional site visits by S&W personnel. During extended periods of heavy rainfall, it is reported that water temporarily accumulates in localized depressions, but completely infiltrates the underlying soil within one to two days following cessation of precipitation.

Storm water from nearby properties also drains to the open excavation. Of particular note is a culvert outlet near the site's northeast corner. This area was regularly monitored by site operators to evaluate potential impact of storm water drainage into the monofill. Based on these observations, there was less flow than anticipated, particularly during the spring thaw when snowmelt was expected to create a temporary storm water surge. We understand that at no time did storm water discharge through the culvert create standing water within the monofill pit.

CONCLUSIONS

Based on the site's drainage characteristics, the site does not presently generate a regulated storm water discharge. Precipitation and runoff is contained within the site boundaries, and infiltrates the ground surface instead of draining to a surface water body or municipal storm sewer system. Therefore, it is our professional opinion that a SWPPP is not required for the PRS facility at this time.

32-1-16736



PRS Storm Water Plan Assessment
June 11, 2007
Page 3

SHANNON & WILSON, INC.

LIMITATIONS

The conclusions presented in this letter are based on site conditions and industrial activities reported by Alaska Demolition staff, and as observed by a Shannon & Wilson Inc. representative on November 3, 2005. It is assumed that the information provided is representative of the conditions and industrial activities throughout the site. The evaluation performed can only provide you with our best judgment as to the environmental characteristics of this site, and in no way guarantees that an agency or its staff will reach the same conclusions as Shannon & Wilson, Inc. The information presented in this letter should be considered representative of the time of our site assessment. Changes in site conditions can occur over time due to natural forces or human activity. In addition, changes in government codes, regulations, or laws may occur. Because of such changes beyond our control, our observations and interpretations for this site may need to be revised.

If you have questions or comments regarding this submittal, please contact the undersigned at (907) 561-2120. We look forward to the opportunity to continue providing environmental consulting needs on this project.

Sincerely,

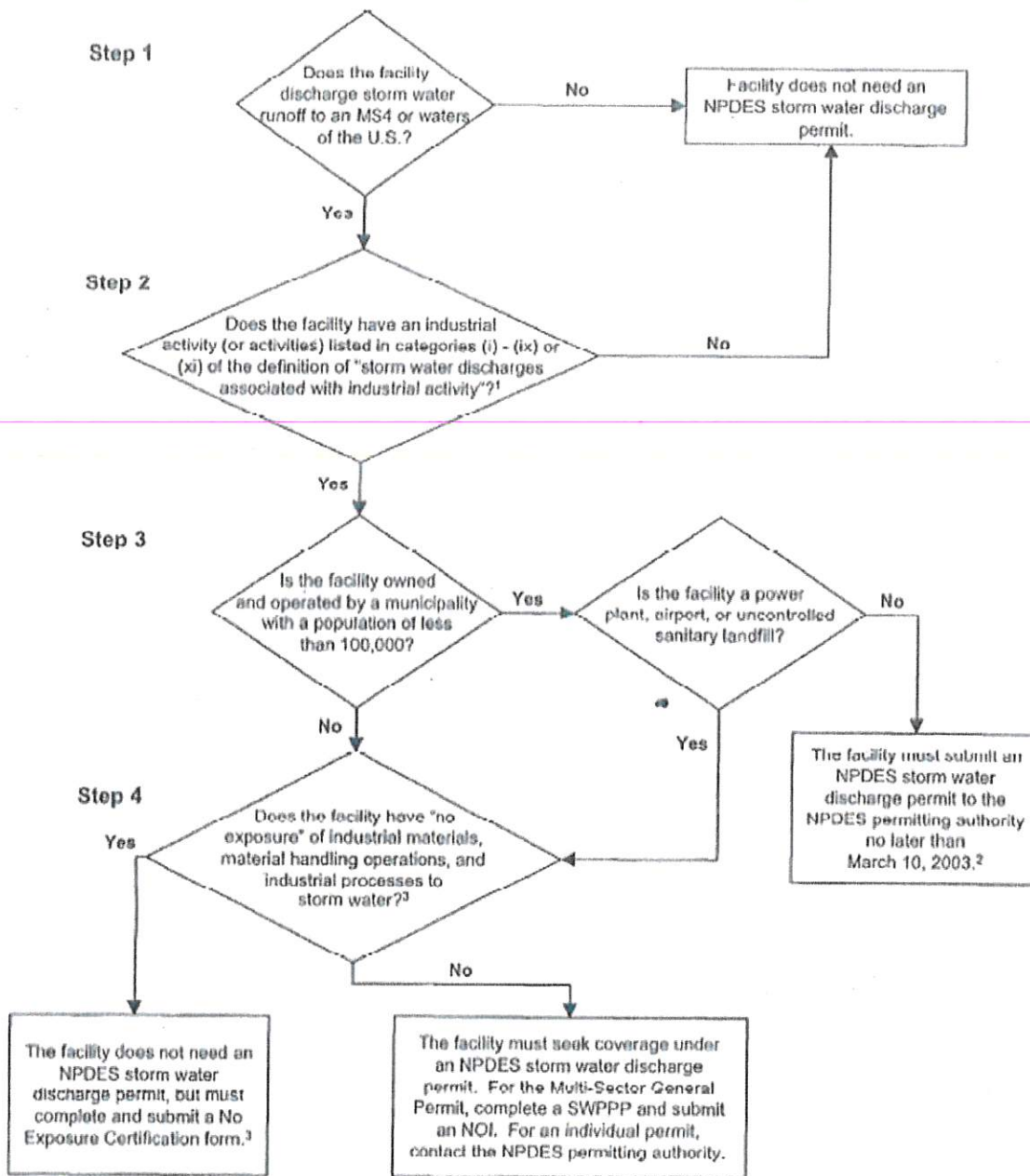
SHANNON & WILSON, INC.

Matthew S. Henry, P.E.
Vice President

Enc: EPA Industrial Permitting Decision Tree

ALASKA DEMOLITION

Industrial Facilities Storm Water Program Permitting Decision Tree



1. See 40 CFR 122.26(b)(14)(i)-(ix), (xi).
 2. See new 122.26(e)(1)(ii). A permit is required unless there is a condition of no exposure as defined at new 122.26(g).
 3. See new 122.26(g) for the definition of "no exposure" and the certification requirements.

Attachment 5



Specializing in Demolition & Environmental Services
2817 Rampart Dr. Anchorage, Alaska 99501
907-274-DEMO(3366) www.alaskademolition.com



ALASKA DEMOLITION

Palmer Reclamation Site

550 Rebarcheck Ave, Palmer, Alaska 99645

Monitoring Plan

1. Visual and Monitoring

A visual monitoring program is to be maintained ensure compliance with the landfill permit, and to otherwise ensure that the landfill operations are not adversely impacting human health, welfare, safety, or the environment. The visual inspection will focus on confirming proper landfill operation and maintenance, identifying potential water control issues, assessing potential environmental impact, and verifying continuing conformance with permit requirements. We do not anticipate that air pollution monitoring will be required for this permit. An example inspection form is provided on the following page.

In accordance with 18 AAC 60.800, the inspection will be conducted by a person who is familiar with the general guidelines of 18 AAC 60 and the specific permit requirements. The visual inspections for this facility will be conducted by a designated qualified landfill supervisor. At a minimum, the inspections will be conducted monthly. Records of the monthly inspections will be kept at the project site and Alaska Demolition's Anchorage office. Records will be maintained for a period of 5 years.

2. Surface Water Monitoring

The nearest permanent surface water body to the subject property is McLeod Lake, located about 1 mile southwest. Considering the nature of landfill operations and the characteristic site topography, it is unlikely that the proposed landfill will impact existing surface water bodies. Moreover, the landfill construction is such that control devices are in place to control/prevent run-off from the site. Specific control details are found in Figure 1. Additionally, it was determined that this facility doesn't meet the criteria that require a Stormwater pollution and prevention plan (SWPPP). A review of the SWPPP applicability was conducted by Shannon & Wilson and a copy of that letter is included with the 2024 re-certification application. For these reasons, we conclude that the facility will not be likely to "cause a violation of the water quality standards in 18 AAC 70," and propose that surface water monitoring is not required.



3- Groundwater Monitoring

The regional water table near the subject site reportedly trends from north to the south, according to a groundwater study performed by the State of Alaska Department of Natural Resources. However, the study also stated that localized groundwater may vary from the regional groundwater flow direction.

The groundwater level in the immediate project vicinity is estimated using an abandoned water well 350 feet west of the gravel pit. An August 2003 groundwater measurement from this well indicated a groundwater elevation of 94.8 feet above mean sea level. Based on surveyed elevations, the lowest point of the excavation is located about 121 feet above mean sea level. Therefore, there was an approximately 26-foot separation between the excavation base and the underlying groundwater in August 2003.

Historical groundwater records were also obtained for a USGS water well located about 0.25 mile southeast of the proposed monofill. Groundwater level measurements collected from the well from 1950 through 1992 generally fluctuated within a 4-foot range, with a maximum 8-foot variance (4 feet below average low groundwater) observed once during the 43-year period. Based on geological and groundwater studies conducted in the Palmer area, the USGS water quality well is likely installed in the same aquifer as the aquifer underlying the subject property. Given the groundwater level measured in the “on-site well” in 2003 and the 8-foot groundwater variance observed in the USGS well, a conservative estimate of the highest groundwater level that might be expected beneath the excavation is about 103 feet above mean sea level. That would provide an 18-foot separation between the excavation base and the groundwater exceeding the minimum 10-foot separation required by regulation.

Groundwater monitoring for the facility is exempt from the groundwater monitoring requirements of 18 AAC 60.820, in accordance with 18 AAC 60.820(a)(8). The proposed facility is an inert waste landfill located in an area that receives less than 25 inches of precipitation annually.

Attachment 6



Specializing in Demolition & Environmental Services
2817 Rampart Dr. Anchorage, Alaska 99501
907-274-DEMO(3366) www.alaskademolition.com

Palmer Reclamation Site
550 Rebarcheck Avenue, Palmer, Alaska 99645

Closure Plan and Cost Estimate:

As stated in the permit application section 10, It is understood that the closure plan submitted with the permit application will be conceptual and may change throughout the active life of the facility. If the facility is within 1 year of closure, a detailed closure plan must be submitted and approved by ADEC.

Description of the closure process

Alaska Demolition will comply with the requirements of the State of Alaska and the City of Palmer CUP for closure and post-closure requirements. At least 24 inches of cover material will be placed over the final landfill footprint. The final slope will be seeded with a mixture of grasses, and otherwise vegetated to maintain appropriate erosion control. In addition, the final grade will promote proper drainage by “crowning” the cover layer to provide a slight downward grade towards the landfill edges. All finished surfaces will have a maximum slope gradient of 20 degrees (max 1:3 vertical to horizontal). The final site map can be found in the 2024 recertification application as Attachment 6

All portions of the landfill that have reached final grade will be covered with 12 inches of intermediate cover material within 7 days at least 12 additional inches of cover material will be placed over the intermediate cover and seeded with grasses within 90 days for all portions of the landfill that have reached final grade. In this manner, the active landfill area at any given time can be reduced, and improve the ability to manage the site in activities safely.

Approximately 70,000 cubic yards of sandy silt (topsoil) is currently stockpiled along the southern edge of the subject gravel pit and this material is reserved for use in the final cover. This material consists of overburden soil that was scraped from the surface of the gravel pit footprint prior to the excavation of the gravel pit. Since the cover material will be maintained on-site, the costs for placing the final cover will be limited to spreading, grading, and seeding activities.

Following the placement of the final cover, the subject property will likely be used for ballfields, hayfields, and/or overflow parking from the Alaska State Fair. There are currently no known permanent survey monuments or markers on the subject property. To protect the site from unauthorized entry or use prior to future land use, the landfill owner will inspect the structural integrity of the fence directly following landfill closure and will post warning signs at regular intervals along the fence. A closure inspection of the landfill will be conducted to identify conformance with the specified cover requirements, and to identify additional settlement,



erosion, or drainage controls, as appropriate. Once the facility is within one year of closure, a detailed closure plan will be submitted for review and approval by the ADEC.

Post-closure care requirements will be conducted to conform with the requirements of 18 AAC 60.395. A Deed Notice following the landfill closure will be provided by the property owner. The owner will record a notation on the deed to the facility (or other written instrument routinely examined during a title search). The notation will include the following information: a description of the site's use as a C&D waste landfill, including an estimate of the type, volume, and mass of landfilled materials; a site plan indicating the boundaries of the waste placement area(s); and details pertaining to the final cover material placed on the landfill. The property owner will also provide written notification to the ADEC that this notation has been recorded.

Additionally, post-closure care requirements will exist for Visual monitoring, and it will be continued for at least 60 consecutive months (5 years) following the landfill closure. If deemed necessary by the property owner and/or ADEC, monitoring may be extended up to 360 months (30 years) to ensure the protection of human health, safety, welfare, and the environment. The visual monitoring will be conducted using the same procedures and forms implemented during the active landfill operation but may be modified to fit the existing site conditions at the time of closure. For this permit, we assume additional monitoring elements will not be required for groundwater, surface water, leachate, gas, or thermal conditions. At the conclusion of the initial 60-month monitoring period, the landfill owner will submit a report that summarizes the monitoring results, describes the existing site conditions, identifies current and potential land uses, and provides recommendations for additional monitoring if warranted.

Closure Cost Estimate

Only the active portions of the landfill will be uncovered during the construction of the landfill. We estimate that the active portions of the landfill will likely be limited to about 2 acres. Therefore, in the instance that no portion of the landfill has been brought to final grade, the steps necessary to immediately close the landfill will consist of providing 24 inches of cover material for the approximately 2-acre active portion of the landfill; providing an additional 12 inches of cover material for up to 12 acres of the landfill that will already be covered with 12 inches of intermediate cover material, and seeding all portions of the landfill with grasses. Note that as portions of the landfill reach final grade and are covered, the immediate closure costs will be reduced because there will be less area of the landfill requiring final cover. Therefore, the cost estimate below is conservative and represents a "worst-case scenario."



Estimated Total Closure Costs

Haul in general organic fill material to provide 24 inches of cover.
Grade out to match the surrounding area: Active Cell Cover (24 inches over 2 acres) estimated 6,500 cubic yards.
The final Cover (12 inches over 2 acres) is estimated at 3,200 cubic yards.
Topsoil (4 inches over 2 acres)
Hydroseeding 4 acres

Estimated Total: \$95,500.00

** Material assumed to be available on-site at no additional cost but not included in the above closure pricing.*

In addition to the closure cost, additional expenditures will be required to conduct the post-closure monitoring specified the estimated cost to conduct 60 monthly inspections and prepare one post-closure report is \$25,000. This cost also includes a \$5,000 contingency to address potential landfill deterioration or other deficiencies that may arise during the post-closure monitoring period.

Demonstration of Financial Responsibility

Currently, there is a Surety Trust Agreement between Alaska Demolition LLC and Peak Trust Company-Alaska Trustee to create a Surety Trust as a means to provide financial assurance in favor of the State of Alaska Department of Environmental Conservation as the Beneficiary, to secure the costs of closure pursuant to the terms of ADEC Solid Waste Permit SWZA004-19a to be performed if necessary, on the Real Property commonly known as the Palmer Reclamation site described as Tax Parcel ID #: 17N02E08D008.

- This account containing \$275,000.00 is held for the closure of area B-2 of the facility.
- This amount was concluded based on the landfill cost estimation worksheets website cited in the permit application section 10, item 2. The calculations from the worksheet are attached to this plan. These were submitted with the modification request for the expansion of operations into Cell #2. Approval for the expansion application was provided by the department in a letter dated March 13, 2017.

Worksheet CEW-01: FORMAT FOR THE ESTIMATION OF CLOSURE COSTS

FILL IN THE BOXES. THE REST WILL BE CALCULATED FOR YOU

Soil Cap Components

| I. Slope & Fill | | <u>Calculation or Conversion</u> | |
|---|--|--------------------------------------|-------------------------|
| a. Area to be capped | <input type="text" value="24"/> acres | $\times 4,840 \text{yd}^2/\text{ac}$ | 116,160 yd ² |
| b. Depth of soil needed for slope and fill | <input type="text" value="6"/> inches | $\times 1 \text{yd}/36 \text{in}$ | 0.17 yd |
| c. Quantity of soil needed | | $a \times b$ | 19,360 yd ³ |
| d. Percentage of soil from off-site | <input type="text" value="0%"/> | | |
| e. Purchase unit cost for off-site material | <input type="text" value=""/> | | /yd ³ |
| f. Percentage of soil from on-site | | $(1 - d)$ | 100% |
| g. Excavation unit cost (on-site material) | <input type="text" value="\$0.50"/> /yd ³ | | |
| h. Total soil unit cost | | $(d \times e) + (f \times g)$ | \$0.50 /yd ³ |
| i. Hauling, Placement and Spreading unit cost | <input type="text" value="\$2.00"/> /yd ³ | | |
| j. Compaction unit cost | <input type="text" value=""/> | | /yd ³ |
| k. Total soil unit cost | | $h + i + j$ | \$2.50 /yd ³ |
| l. Soil subtotal | | $k \times b$ | \$48,400 |
| m. Percent compaction | <input type="text" value=""/> | | |
| Total Slope & Fill Cost | | $l \times (1 + m)$ | \$48,400 |

II. Infiltration Layer Soil

Infiltration Soil Cost

| | | | |
|---|--|--------------------------------------|-------------------------|
| a. Area to be capped | <input type="text" value="24"/> acres | $\times 4,840 \text{yd}^2/\text{ac}$ | 116,160 yd ² |
| b. Depth of infiltration soil needed | <input type="text" value="6"/> inches | $\times 1 \text{yd}/36 \text{in}$ | 0.17 yd |
| c. Quantity of infiltration soil needed | | $a \times b$ | 19,360 yd ³ |
| d. Percentage of soil from off-site | <input type="text" value=""/> | | |
| e. Purchase unit cost for off-site material | <input type="text" value=""/> | | /yd ³ |
| f. Percentage of soil from on-site | | $(1 - d)$ | 100% |
| g. Excavation unit cost (on-site material) | <input type="text" value="\$0.50"/> /yd ³ | | |
| h. Total infiltration soil unit cost | | $(d \times e) + (f \times g)$ | \$0.50 /yd ³ |
| i. Hauling, Placement and Spreading unit cost | <input type="text" value="\$2.00"/> /yd ³ | | |
| j. Compaction unit cost | <input type="text" value=""/> | | /yd ³ |
| k. Total infiltration soil unit cost | | $h + i + j$ | \$2.50 /yd ³ |
| l. Infiltration soil subtotal | | $k \times b$ | \$48,400 |
| m. Percent compaction | <input type="text" value=""/> | | |
| n. <i>Subtotal Infiltration Soil Cost</i> | | $l \times (1 + m)$ | \$48,400 |

Soil Admixture Cost

| | | | |
|-----------------------------------|-------------------------------|--------------------------------------|-------------------|
| o. Area to be capped | <input type="text" value=""/> | $\times 4,840 \text{yd}^2/\text{ac}$ | 0 yd ² |
| p. Soil admixture unit cost | <input type="text" value=""/> | | /yd ² |
| q. <i>Subtotal admixture cost</i> | | $a \times b$ | \$0 |

Soil Testing

| | | | |
|--------------------------------------|-------------------------------|--------------|-------|
| r. Area to be capped | <input type="text" value=""/> | | acres |
| s. Testing unit cost | <input type="text" value=""/> | | /acre |
| t. <i>Subtotal soil testing cost</i> | | $a \times b$ | \$0 |

Total Infiltration Soil Cost (soil, admixtures, and testing) $n + q + t$ **\$48,400**

| III. Erosion Control / Protective Cover Soil | | | | | |
|---|--|----------------------|------------------|----------------------------|-------------------------|
| a. | Area to be capped | <input type="text"/> | acres | x 4,840yd ² /ac | 0 yd ² |
| b. | Depth of soil needed | <input type="text"/> | inches | x 1yd/36in | 0.00 yd |
| c. | Quantity of soil needed | | | a x b | 0 yd ³ |
| d. | Percentage of soil from off-site | <input type="text"/> | | | |
| e. | Purchase unit cost for off-site material | <input type="text"/> | /yd ³ | | |
| f. | Percentage of soil from on-site | | | (1 - d) | 100% |
| g. | Excavation unit cost (on-site material) | <input type="text"/> | /yd ³ | | |
| h. | Total erosion/protective soil unit cost | | | (d x e) + (f x g) | \$0.00 /yd ³ |
| i. | Hauling, Placement and Spreading unit cost | <input type="text"/> | /yd ³ | | |
| j. | Compaction unit cost | <input type="text"/> | /yd ³ | | |
| k. | Total soil unit cost | | | h + i + j | \$0.00 /yd ³ |
| l. | Erosion/Protective soil subtotal | | | k x b | \$0 |
| m. | Percent compaction | <input type="text"/> | | | |
| Total Erosion Control/Protective Cover Soil Cost | | | | l x (1 + m) | \$0 |

| IV. Vegetative support soil (Topsoil) | | | | | |
|---------------------------------------|--|-------------------------------------|------------------|----------------------------|-------------------------|
| a. | Area to be capped | <input type="text" value="24"/> | acres | x 4,840yd ² /ac | 116,160 yd ² |
| b. | Depth of topsoil needed | <input type="text" value="4"/> | inches | x 1yd/36in | 0.11 yd |
| c. | Quantity of topsoil needed | | | a x b | 12,907 yd ³ |
| d. | Percentage of topsoil from off-site | <input type="text"/> | | | |
| e. | Purchase unit cost for off-site material | <input type="text"/> | /yd ³ | | |
| f. | Percentage of topsoil from on-site | | | (1 - d) | 100% |
| g. | Excavation unit cost (on-site material) | <input type="text" value="\$0.50"/> | /yd ³ | | |
| h. | Total topsoil unit cost | | | (d x e) + (f x g) | \$0.50 /yd ³ |
| i. | Hauling, Placement and Spreading unit cost | <input type="text" value="\$2.00"/> | /yd ³ | | |
| j. | Total soil unit cost | | | h + i | \$2.50 /yd ³ |
| Total Topsoil Cost | | | | c x j | \$32,267 |

| V. Vegetative Cover | | | | | |
|------------------------------------|--------------------------------------|----------------------------------|-------|-------------|--------------|
| a. | Area to be vegetated | <input type="text" value="24"/> | acres | | |
| b. | Vegetative cover (seeding) unit cost | <input type="text" value="\$8"/> | /acre | | |
| c. | Erosion control matting unit cost | <input type="text" value="\$0"/> | /acre | | |
| Total Vegetative Cover Cost | | | | a x (b + c) | \$180 |

Soil Cap Component Subtotal (I + II + III + IV + V): \$129,247

Geosynthetic Barrier & Infiltration Layers

| VI. Flexible Membrane Liner | | | | Calculation or Conversion | |
|---|------------------------|----------------------|------------------|-----------------------------|-------------------------|
| a. | Quantity of FML needed | <input type="text"/> | acres | x 43,560ft ² /ac | 0 ft ² |
| b. | Purchase unit cost | <input type="text"/> | /ft ² | | |
| c. | Installation unit cost | <input type="text"/> | /ft ² | | |
| d. | Total FML unit cost | | | b + c | |
| Total FML cost | | | | a x d | \$0 |
| VII. Geosynthetic Clay Liner | | | | | |
| a. | Quantity of GCL needed | <input type="text"/> | acres | x 43,560ft ² /ac | 0 ft ² |
| b. | Purchase unit cost | <input type="text"/> | /ft ² | | |
| c. | Installation unit cost | <input type="text"/> | /ft ² | | |
| d. | Total GCL unit cost | | | b + c | \$0.00 /ft ² |
| Total GCL Cost | | | | a x d | \$0 |
| Geosynthetic Layers Subtotal (VI + VII): | | | | | \$0 |

Drainage Components

| | | Calculation or Conversion | |
|--|--|---------------------------------------|---|
| Component A: Sand/Gravel Drainage | | | |
| a. | Area to be capped | <input type="text"/> acres | $\times 43,560 \text{ ft}^2/\text{ac}$ 0 yd ² |
| b. | Depth of sand or gravel needed | <input type="text"/> inches | $\times \text{yd}/36 \text{ in}$ 0.00 yd |
| c. | Quantity of drainage material needed | <input type="text"/> yd ³ | 0 yd ³ |
| d. | Percentage of material from on-site | <input type="text"/> | |
| e. | Purchase unit cost for off-site material | <input type="text"/> /yd ³ | |
| f. | Percentage of material from on-site | <input type="text"/> | 100% |
| g. | Excavation unit cost (on-site material) | <input type="text"/> /yd ³ | |
| h. | Total drainage material unit cost | <input type="text"/> | $(f) \times (e) + (g) \times (f)$ \$0.00 /yd ³ |
| i. | Hauling, Placement and Spreading unit cost | <input type="text"/> /yd ³ | |
| j. | Compaction unit cost | <input type="text"/> /yd ³ | |
| k. | Total drainage material unit cost | <input type="text"/> | $h + i + j$ \$0.00 /yd ³ |
| l. | Drainage material subtotal | <input type="text"/> | $k \times (c)$ \$0.00 |
| m. | Percent compaction | <input type="text"/> | |
| | Total drainage material cost: | <input type="text"/> | $l \times (1 - m)$ \$0 |
| Component B: Geotextile | | | |
| a. | Quantity of geotextile needed | <input type="text"/> acres | $\times 43,560 \text{ ft}^2/\text{ac}$ 0 ft ² |
| b. | Purchase unit cost | <input type="text"/> /ft ² | |
| c. | Installation unit cost | <input type="text"/> /ft ² | |
| d. | Total geotextile unit cost | <input type="text"/> | $b + c$ \$0.00 /ft ² |
| | Total Geotextile Cost: | <input type="text"/> | $a \times d$ \$0 |
| Component C: Geonet Composite | | | |
| a. | Quantity of geonet composite needed | <input type="text"/> acres | $\times 43,560 \text{ ft}^2/\text{ac}$ 0 ft ² |
| b. | Purchase unit cost | <input type="text"/> /ft ² | |
| c. | Installation unit cost | <input type="text"/> /ft ² | |
| d. | Total geonet composite unit cost | <input type="text"/> | $b + c$ \$0.00 /ft ² |
| | Total Geonet Composite Cost: | <input type="text"/> | $a \times d$ \$0 |
| Component D: Drainage Tile | | | |
| a. | Length of drainage tile needed | <input type="text"/> LF | |
| b. | Purchase unit cost | <input type="text"/> /LF | |
| c. | Trenching and backfilling cost | <input type="text"/> /LF | |
| d. | Total drainage tile unit cost | <input type="text"/> | $b + c$ \$0.00 /ft ² |
| | Total Drainage Tile Cost: | <input type="text"/> | $a \times d$ \$0 |

XII. Drainage Channels (Stormwater Control)

Drainage benches and berms

| | | | | |
|---|----------------------|-----|-------|-----|
| a. Size of drainage bench needed | <input type="text"/> | LF | | |
| b. Drainage bench unit cost | <input type="text"/> | /LF | | |
| c. <i>Subtotal drainage bench cost</i> | | | a x b | \$0 |
| d. Size of drainage swale/berm needed | <input type="text"/> | LF | | |
| e. Drainage swale/berm unit cost | <input type="text"/> | /LF | | |
| f. <i>Subtotal drainage swale/berm cost</i> | | | d x e | \$0 |

Rip Rap

| | | | | |
|-------------------------------|----------------------|------------------|-------|-----|
| g. Quantity of Rip Rap needed | <input type="text"/> | yd ² | | |
| h. Rip rap unit cost | <input type="text"/> | /yd ² | | |
| i. <i>Total rip rap cost</i> | | | g x h | \$0 |

Gabian Baskets

| | | | | |
|---------------------------------------|----------------------|------------------|-------|-----|
| j. Quantity of gabian baskets needed | <input type="text"/> | yd ³ | | |
| k. Gabian basket unit cost | <input type="text"/> | /yd ³ | | |
| l. <i>Subtotal gabian basket cost</i> | | | j x k | \$0 |

Total Stormwater Control c + f + i + l **\$0**

Drainage Component Subtotal (VIII + IX + X + XI + XII): **\$0**

Landfill Gas and Groundwater Features

XIII. Landfill Gas Monitoring & Control Components

Calculation

Landfill Perimeter System

| | | | | |
|-------------------------------------|----------------------|--------|-------|-----|
| a. Number of probes to be installed | <input type="text"/> | probes | | |
| b. LFG probe unit cost | <input type="text"/> | /probe | | |
| c. <i>Subtotal LFG probe cost</i> | | | a x b | \$0 |

Landfill Control Systems

| | | | | |
|--|----------------------|--------------|-------------|-----|
| d. Area to be closed | <input type="text"/> | acres | | |
| e. Average number of vents per acre | <input type="text"/> | vents / acre | | |
| f. LFG vent unit cost | <input type="text"/> | /vent | | |
| g. <i>Subtotal LFG vent cost</i> | | | d x e x f | \$0 |
| h. Length of header pipe needed | <input type="text"/> | LF | | |
| i. Header pipe unit cost | <input type="text"/> | /LF | | |
| j. Header pipe installation cost | <input type="text"/> | /LF | | |
| k. <i>Subtotal LFG active vent hook-up</i> | | | h x (i + j) | \$0 |

Total Landfill Gas Management Cost c + g + k **\$0**

XIV. Groundwater Monitoring Components

| | | | | |
|---|----------------------|---------|---------------------------|------------|
| a. Hydrogeologic study cost | <input type="text"/> | | | |
| b. Number of wells to be installed | <input type="text"/> | wells | | |
| c. GW Monitoring Well unit cost | <input type="text"/> | /well | | |
| d. Number of wells > 50 ft length | <input type="text"/> | wells | | |
| e. Additional well length over 50 ft | <input type="text"/> | LF/well | | |
| f. Unit cost for additional well length | <input type="text"/> | /LF | | |
| Total Groundwater Monitoring Well Cost | | | a + (b x c) + (d x e x f) | \$0 |

Landfill Gas & Groundwater Features Subtotal (XIII + XIV): **\$0**

Miscellaneous

XV. Removal and Disposal of Stockpiled Material

| | | | | |
|---------------------------------------|----------------------|------------------|-------------|------------|
| a. Quantity of stockpiled materials | <input type="text"/> | yd ³ | | |
| b. Loading and Hauling unit cost | <input type="text"/> | /yd ³ | | |
| c. Disposal unit cost | <input type="text"/> | /yd ³ | | |
| d. Total Removal/Disposal Cost | | | a x (b + c) | \$0 |

Calculation

XVI. Erosion/Sediment Control

| | | | | |
|----------------------------------|----------------------|-----|-------|------------|
| a. Quantity of silt fence needed | <input type="text"/> | LF | | |
| b. Silt Fence unit cost | <input type="text"/> | /LF | | |
| Total Silt Fence Cost | | | a x b | \$0 |

XVII. Landfill Access Road

| | | | | |
|----------------------------------|----------------------|------------------|-------------|-------------------|
| a. Size of LF access road | <input type="text"/> | yd ² | | |
| b. Depth of gravel needed | <input type="text"/> | inches | x 1yd/36in | 0.0 yd |
| c. Depth of asphalt needed | <input type="text"/> | inches | x 1yd/36in | 0.0 yd |
| d. Total material needed | | | a x (b + c) | 0 yd ³ |
| e. Road material unit cost | <input type="text"/> | /yd ³ | | |
| f. Placement/Spreading unit cost | <input type="text"/> | /yd ³ | | |
| Total access road cost | | | c x (d + e) | \$0 |

XVIII. Site Security

Fencing

| | | | | |
|---------------------------------|----------------------|-----|-------|------------|
| a. Length of fencing needed | <input type="text"/> | ft | | |
| b. Fence unit cost | <input type="text"/> | /ft | | |
| c. Subtotal fencing cost | | | a x b | \$0 |

Gate or Barrier

| | | | | |
|------------------------------|----------------------|-------|-------|------------|
| d. Number of gates required | <input type="text"/> | | | |
| e. Gate unit cost | <input type="text"/> | /gate | | |
| f. Subtotal gate cost | | | d x e | \$0 |

Closed Sign

| | | | | |
|---------------------------------|---------------------------------------|-------|-----------|----------------|
| g. Number of signs required | <input type="text" value="2"/> | | | |
| h. Sign unit cost | <input type="text" value="\$500.00"/> | /gate | | |
| i. Subtotal sign cost | | | g x h | \$1,000 |
| Total site security cost | | | c + f + i | \$1,000 |

XIX. Mobilization / Demobilization

| | | | | |
|---|---------------------------------------|--|--|-----------------|
| a. Cost for mobilization/demobilization | <input type="text" value="\$10,000"/> | | | |
| Total mobilization/demobilization cost | | | | \$10,000 |

Miscellaneous Subtotal (XV + ... + XIX): \$11,000

Closure Cost Subtotal (CCS): (I + ... + XIX) **\$140,247**

Contingency (10%): CCS x 0.10 **\$14,025**

Engineering & Documentation:

| | | |
|--|------------|---------------------------------------|
| Construction QA/QC (1%) | CCS x 0.01 | \$1,402 |
| Closure Certification and CQA Report (1%) | CCS x 0.01 | \$1,402 |
| Survey and as-builts (2%) | CCS x 0.02 | \$2,805 |
| Cost for survey and deed notation | | <input type="text" value="\$20,000"/> |
| Total Engineering & Documentation Costs | | \$25,610 |

Total Closure Cost: CCS + Contingency + Engineering **\$ 179,881**

Total Post-Closure Care Cost

from tab 2

\$ 60,445

Financial Assurance Required

\$ 240,326

AGREED to 200K for FA - LA 3/23/16

Attachment 7

City of Palmer
PLANNING AND ZONING COMMISSION

Conditional Use Permit #14-001 (Modified 2018 & 2020)

Tax Parcel ID #: 17N02E08D008

Red indicates modified 2018
Blue indicates modified 2020

The City of Palmer Planning and Zoning Commission (Commission) upon consideration of an application for a conditional use permit by Alaska Demolition LLC ("Owner"), hereby approves the use of tax parcel 17N02E08D008 for the use stated in this permit subject to the conditions, controls, and safeguards stated in this permit. The purpose of this conditional use permit is to ensure that the stated uses and appropriate future uses described in the 2004 reclamation plan as submitted by Alaska Demolition will be compatible with the surrounding area and will not create a health or safety hazard to the public.

The Palmer City Council approved the zoning designation of I-Industrial with Special Limitations for this parcel at its regular meeting of January 28, 2014. The City Council passed Ordinance 14-001-Z-1 which is attached and incorporated by reference into this conditional use permit as is fully stated in the permit. The conditions contained in the ordinance and in this permit, when accepted by the Owner's signature below, constitute an agreement between the Owner and the city, which may be enforced by the city pursuant to Palmer Municipal Code Chapter 17.04.

The only allowable Industrial use of the property is described in Section 3 of Ordinance No. 612-Z-57 (Substitute) as "reclamation of the property through the operation of an inert waste mono-fill and those activities incidental thereto that are necessary to reclaim the property," (the "Permitted Use") subject to a conditional use permit. Such Permitted Use is permitted on the property only pursuant to this permit under the following conditions:

Permit Term:

- 1) ~~This conditional use permit shall become effective only upon the approval of Ordinance No. 14-001-Z-1, zone change from R-1 Single-family Residential to I-Industrial with Special Limitations, for a period of 10 years with a review by the Planning and Zoning Commission in 5 years.~~ **Conditional Use Permit #14-001(as modified by the Planning and Zoning Commission in 2018 & 2020) is effective until February 1, 2029 if and only if Ordinance#18-007-Z-2-SL is adopted by the City Council. If the City Council does not adopt Ordinance#18-007-Z-2-SL, Conditional Use Permit #14-001(as modified by the Planning and Zoning Commission in 2018) shall terminate on January 28, 2024. (Modified 2018)**
- 2) **The Industrial zoning classification of this property shall terminate no later than 10 years after the effective date of Ordinance No. 14-001-Z-1, unless terminated sooner pursuant to conditions contained within the ordinance or unless the Industrial zoning classification is extended by the adoption of Ordinance #18-007-Z-2-SL by City Council. (Modified 2018)**

Other Permits:

- 3) **The owner shall comply with all local, state, and federal ordinances, regulations, and statutes applicable to the proposed activities.**

- 4) The owner shall provide copies of all permits issued by state and federal agencies to the City of Palmer prior to commencement of the Permitted Use. The owner shall also provide to the City of Palmer a copy of every application for an amendment to any such permit at the time the application is filed with the permitting agency, and a copy of any amendment approved by the permitting agency shall be provided to the City within five days of issuance.

Other Conditions

The reclamation activity shall be conducted in a manner to minimize the impact on adjacent lands and residents and allow only those industrial activities necessary to reclaim the property to establish the long range compatibility of the property with zoning districts in the neighboring areas. The attached 2018 "Exhibit A L Palmer Reclamation Site" plan identifies the property and areas within the property, as follows: Area A-1 (State Fair parking), Area A-2 (State Fair Parking), Area B-1 (AK Demo Operations), Area B-2 (Current Active C & D Disposal) and Area B-3 (Gravel Extraction Additional C & D Disposal).

- 5) ~~The existing driveway on the Inner Springer Loop which provides access to the eastern edge of the property shall be used only until a new access driveway can be constructed on Rebarchek Road, which shall be done as soon as practical and no later than September 5, 2005. Once the new access driveway is opened, the existing driveway on Inner Springer Loop shall be closed to truck traffic. [Construction of access onto Rebarchek Road has been completed]~~ Driveway off Inner Springer Loop to remain closed. [Modified 2018]
- 6) All traffic entering the property shall approach the property from the Glenn Highway, through lands owned by the Alaska State Fair, Inc. and access the property by using Rebarchek Road.
- 7) ~~Fencing shall be installed at the boundary of the property along Rebarchek Road and the Inner Springer Loop Road by June 1, 2004. [This condition has been met.]~~ Fencing adequately maintained around perimeter of property. [Modified 2018]
- 8) Gates with locks shall be placed at all entrances to the property. The gates must be locked at all times when supervisory personnel are not on site.
- 9) A fifty foot setback shall be maintained from all property boundaries in which no excavation of material shall occur.
- 10) A natural buffer of twenty five feet shall be maintained on the east, west and north boundaries of the property.
- 11) A natural buffer of ~~fifty~~ **seventy-five** feet shall be maintained on the southern boundary of the property. [Modified 2018]
- 12) A stormwater plan which meets applicable state law shall be prepared and implemented as approved. Copies of the approved plan and amendments shall be provided to the City according to paragraph 4 of this permit. [A storm water plan dated November 8, 2005 by Shannon & Wilson, Inc. is on file in our office.]
- 13) The owner shall maintain and operate watering equipment on site to prevent and suppress the creation of windblown dust and dirt.
- 14) The owner shall pick up and contain any and all paper, debris and other materials on and around the property.
- 15) All equipment shall be operated in a manner to minimize the disturbance of neighboring residents and shall conform with PMC 8.36.020 F (Nuisances, Specific Acts Designated – Noise) and PMC 8.36.025 (Certain Acts Requiring a Permit).

- 16) The owner shall conduct Permitted Use activities on the property only between the hours of 6:00 am to 10:00 pm, Monday through Sunday.
- 17) To prevent accumulation of uncovered and exposed debris, the placement of construction and demolition debris shall be executed by the construction of defined "cells" or active fill zones with average dimensions of sixty feet wide by 150 feet in length and ten feet in depth. Each cell shall be covered with clean material when fully constructed.
- 18) Any portion of the property from which gravel is extracted pursuant to this permit shall be brought back to original grade by the fill and placement of mineral soils, exempt fill and land clearing debris. ~~[Amended December 19, 2013; new condition listed as #37.]~~ **(Modified 2018)**
- 19) Except as provided in the following paragraph, exempt fill consists of stumps, brush, peat, and similar land clearing debris; clay, silt and other mineral soils; and other items as listed in 18 AAC 60.005.
- 20) For purposes of this permit, exempt fill specifically excludes the following material and other similar material:
 - a. domestic wastewater, nondomestic wastewater, and other wastes that are subject to a permit under AS 46.03, 18 AAC 72, or 33 U.S.C. 1342 (Federal Water Pollution Control Act, sec. 402), as amended through August 21, 1998;
 - b. sewage, septage and septic tank pumpings, regardless of the amount of solids and regardless of whether regulated under 18 AAC 72
- 21) ~~The eastern and southern portions of the property (Areas B and C, respectively) used to accept exempt fill material and extract gravel shall be operated in a manner to minimize the total excavated area at any one time. As of July 31 of each year, the areas excavated pursuant to this permit shall be refilled to not less than eighty five percent (85%) of the excavated volume with exempt materials.~~ **[Modified 2018]**
- 22) For purposes of section 1.G. 4. iii. of the ordinance, the boundary of the area representing fifty percent of the southern portion of the property is shown on the attached map as a dashed line running parallel to and seven hundred (700) feet west of the east property boundary.
- 23) Excavation of all side slopes shall not exceed one and one half to one (1.5/1). Within 180 days after issuance of this permit, all existing side slopes shall be reduced to not exceed one and one half to one. [This condition has been met.]
- 24) The depth of gravel extraction shall not exceed a depth of 130 feet above mean sea level, as indicated on the September 2003 "Site Map-Fig.2" prepared by Shannon and Wilson, Inc.
- 25) ~~Gravel extraction on the eastern and southern portions of the property shall cease when the existing pit (Areas A and B) has been filled and brought back to the grade of adjacent undisturbed land.~~ ~~[Amended December 19, 2013; new condition listed as #37.]~~ ~~Exportation of gravel on the eastern and southern portions of the property shall cease on December 31, 2020. (Refer to condition #37; Modified 2018)~~ All areas of Palmer Reclamation Site as depicted by Exhibit L shall be brought back to a grade of the adjacent properties.
- 26) The completed landfill cover shall be graded to promote surface water runoff and be in compliance with 18AAC60.460.

Best Management Practices

- 27) All disposals of exempt or Construction Demolition materials (C & D) in the Mono-fill area require written authorization to dispose by Management Site Representative (MSR).
- 28) Mono-fill shall be gated and locked when not in operation or when not supervised by MSR. All visitors to the Site must check in with MSR prior to disposal of any materials.
- 29) All C & D disposal loads entering the site must be secured and covered with a tarp or other containment and the loads manifested by MSR.
- 30) All C & D loads are placed into separate earthen cells contained by gravel backfills on the bottom of the cell and all four sides and then covered by not less than one foot of backfill.
- 31) All cells are capped and covered not less than weekly. Cells to be covered daily if wind or other conditions require.
- 32) Supervisory labor to be present on all operating days and Mono-fill area to be inspected daily for compliance.
- 33) Surrounding earthen berm and drainage ditches are inspected not less than weekly or more seasonally, as required to ensure correct conditions.
- 34) Annual topographic survey of the site to be conducted by Alaska Demolition and cubic volume of site disposal calculated by registered licensed surveyor quantifying disposal fills and gravel extractions if any during the annual period preceding the date of survey.

Additional Conditions:

- 35) ~~The Conditional Use Permit #14-001 shall terminate no later than 10 years after the effective date of Ordinance No. 14-001-Z-1.~~ Conditional Use Permit #14-001(as modified by the Planning and Zoning Commission in 2018) is effective until February 1, 2029 if and only if Ordinance#18-007-Z-2-SL is adopted by the City Council. If the City Council does not adopt Ordinance#18-007-Z-2-SL, Conditional Use Permit #14-001(as modified by the Planning and Zoning Commission in 2018) shall terminate on January 28, 2024. (Modified 2018)
- 36) There shall be a mandatory review five years after the effective date of Conditional Use Permit #14-001 by the Planning and Zoning Commission.
- 37) ~~There shall be no gravel extraction allowed.~~ Gravel extraction and screening to be limited to Area B-3 depicted in Exhibit A L of the 2020 Palmer Reclamation Site plan with a 75' setback and vegetative buffer on southern boundary, and the authorization for gravel extraction contained in Conditional Use Permit #14-001 (Modified 2018) shall expire on December 31, 2020 2022. (Modified 2018 & 2022)
- 38) The site shall be two-thirds complete within 5 years of the effective date of Conditional Use Permit #14-001.
- 39) A reclamation bond shall be required in an amount sufficient to cover the total costs of reclamation.

Additional Condition by Modification in 2018:

- 40) Gravel truck access shall be limited to gravel extraction Area B-3 from E. Rebarchek Road. Construction truck traffic on Alaska State Fair property is subject to an access route and traffic management plan approved by the Alaska State Fair.

Additional Condition by Modification in 2020:

- 41) Gravel exportation shall be limited to a net excavation of 250,000 cubic yards. (measured by total volume of C & D and exempt material imported to total volume of pit-run gravel exported) and shall be limited to gravel extraction Exhibit L, Area B-3 from Palmer Reclamation Site on E. Rebarchek Road.

Any changes, alterations or deletions of the intended uses, must receive prior approval of the Planning and Zoning Commission.

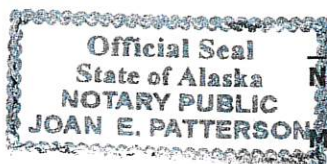
Every term and condition of this permit is binding upon the Owner, Owner's assigns and successors in interest, and every person occupying or operating on the property. The use of the term Owner in reference to the terms and conditions of this permit shall be construed to include every person operating on the property by, through, or under the authority or consent of the Owner.

Dated this 11th day of December, 2020 for the Palmer Planning and Zoning Commission.

By: Casey Peterson
Casey Peterson, Vice Chairman

THIS IS TO CERTIFY that on this 11th day of December, 2020, before the undersigned Notary Public in and for the State of Alaska, duly commissioned and sworn, personally appeared, Casey Peterson, Vice Chairman of the Palmer Planning and Zoning Commission and he acknowledged that he had signed the same freely and voluntarily for the uses and purposes therein stated.

WITNESS my hand and official seal the day and year in this certificate first written.



Joan E. Patterson
NOTARY PUBLIC FOR STATE OF ALASKA
My Commission Expires: with office

Acceptance

The Owner, Justin T.F. Green, _____ of Alaska Demolition, LLC, hereby accepts and agrees to abide by the terms and conditions of this permit.

Dated this 19th day of Aug, 2021.

By: _____
Its: Owner
(Owner or Designated Rep)

STATE OF ALASKA)
) ss:
THIRD DISTRICT)

THIS IS TO CERTIFY that on this 19th day of August, 2021, before the undersigned Notary Public in and for the State of Alaska, duly commissioned and sworn, personally appeared, Justin T.F. Green of Alaska Demolition, LLC, and he acknowledged that he had signed the same freely and voluntarily for the uses and purposes therein stated on behalf of the corporation.

WITNESS my hand and official seal the day and year in this certificate first written.



Joan E. Patterson
NOTARY PUBLIC FOR STATE OF ALASKA

My Commission Expires: with office