Sidney W. Michaels
HC 66, Box 28000
Nenana, Alaska 99760
907-582-2300
May 23, 2016

Mayor Clay Walker
Denali Borough Assembly
Denali Borough Planning Commission
P.O. Box 480
Healy Alaska, 99743

Re: Proposal to lease to Central Monofill Services, Inc. 753 acres for 95 years at milepost 388 of the Alaska Railroad for material storage, monofill and class 1 landfill.

Although I am a member of the Denali Borough Planning Commission, I am not submitting this material as a commissioner but as a private citizen. The information contained in this material in no way reflects the position of the Denali Borough Planning Commission but are strictly my own personal views.

Due to the size and scope of this monofill/landfill I believe the borough should take a very active role in determining if this is in the best interest of the borough. Once this monofill/landfill is in operation it will be with us for our lifetimes, our children's lifetimes, our grandchildren's lifetimes, etc. We don't want to make a mistake now!

It would seem reasonable to ask the Alaska Railroad and the Alaska Department of Environmental Conservation to allow the Denali Borough additional time to consider this issue. If the approval of this monofill/landfill is delayed it can still be later approved. Once there is waste in the ground there appears to be no turning back.

All I'm asking is that you give this matter the serious consideration that it deserves. The future citizens of the Denali Borough are depending on you.

Sincerely,

Sidney W. Michaels

Sidney W. Michaels

RECEIVED
MAY 25 2016
DENALI BOROUGH

One section from the NIH National Cancer Institute brochure:

Asbestos Exposure and Cancer Risk

What are the health hazards of exposure to asbestos?

People may be exposed to asbestos in their workplace, their communities, or their homes. If products containing asbestos are disturbed, tiny asbestos fibers are released into the air. When asbestos fibers are breathed in, they may get trapped in the lungs and remain there for a long time. Over time, these fibers can accumulate and cause scarring and inflammation, which can affect breathing and lead to serious health problems (6).

Asbestos has been classified as a known human carcinogen (a substance that causes cancer) by the U.S. Department of Health and Human Services, the EPA, and the International Agency for Research on Cancer (2, 3, 7, 8). Studies have shown that exposure to asbestos may increase the risk of lung cancer and mesothelioma (a relatively rare cancer of the thin membranes that line the chest and abdomen). Although rare, mesothelioma is the most common form of cancer associated with asbestos exposure. In addition to lung cancer and mesothelioma, some studies have suggested an association between asbestos exposure and gastrointestinal and colorectal cancers, as well as an elevated risk for cancers of the throat, kidney, esophagus, and gallbladder (3, 4). However, the evidence is inconclusive.

Asbestos exposure may also increase the risk of asbestosis (an inflammatory condition affecting the lungs that can cause shortness of breath, coughing, and permanent lung damage) and other nonmalignant lung and pleural disorders, including pleural plaques (changes in the membranes surrounding the lung), pleural thickening, and benign pleural effusions (abnormal collections of fluid between the thin layers of tissue lining the lungs and the wall of the chest cavity). Although pleural plaques are not precursors to lung cancer, evidence suggests that people with pleural disease caused by exposure to asbestos may be at increased risk for lung cancer (2, 9).

More info at: http://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet

Sidney W. Michaels
HC 66, Box 28000
Nenana, Alaska 99760
907-582-2300
May20, 2016

Director of Real Estate
P.O. Box 107500
Anchorage, Alaska 99510-7500

Re: Proposal to lease to Central Monofill Services, Inc. 753 acres for 95 years at milepost 388 of the Alaska Railroad for material storage, monofill and class 1 landfill.

I live approximately a half mile from the property to be leased at milepost 388. Upon attending an Anderson City Council meeting at which Shane Durand gave a presentation, I learned that Central Monofill Inc. plan to use this site to dispose of hazardous waste. This is of great concern for our community.

It seems the Alaska Railroad will be taking a risk with leasing this area for a Hazardous Waste Site. I assume the AK RR believes the rent from this lease is greater than the risk. Central Monofill will also make a profit from the use of this Hazardous Waste Site. Evidently they feel that this profit will be greater than the risk of operating this Hazardous Waste Site. There is a risk to the City of Anderson, the Denali Borough and residents of the local community. However, no one has shown where the City the Borough or the residents will benefit from this Hazardous Waste Site. Where you have all risk and no gain is the worst situation for any entity. Would you support this situation for your community?

Our community went through this same type of proposal many years ago. Bernie Karl proposed operating a very large landfill on this same land. After the AK RR Board of Directors visited this site and witnessed the community's opposition the proposal was ended. For this action our community saw the AK RR as the good neighbor that it has always been.

I am enclosing a memo that I presented to the Anderson City Council and a page from the NIH National Cancer Institute brochure.

I am in hopes that you will reconsider the leasing of the milepost 388 land for a Hazardous Waste Site.

Sincerely,

Sidney W. Michaels

Re: Central Monofill Services, Inc., Alaska Railroad Lease.

It appears that Central Monofill Services, Inc. has obtained the contract to remove the old BMEWS radar on Clear Air Force Station. Also, they are applying to lease Alaska Railroad property near Clear to dispose of the demolition debris. This leased land would be used for "Material Storage, Monofill (construction and demolition debris) and Class 1 Landfill" per AK RR public notice.

This property surrounds the AK RR gravel pit at mile 388 of the AK RR and extends to the Parks Highway at mile 279. The area under consideration covers approximately 750 acres (more than a square mile). The term of the lease is "not to exceed 95 years". It appears from these numbers that this is to be a very large and long term operation. To be feasible, Central Monofill will need to find debris other than the Clear radar and more trash than can be provided by the local area.

Items to be stored and landfilled could include asbestos, lead paint, PCBs and other hazardous materials. The amount of trash to be landfilled there could be huge making this one of the largest landfills if not the largest in the state. With RR and highway access, monofill and trash could be brought there from most populated areas of the state.

The class 1 landfill will be built with a "liner". It appears that the monofill will not. Liners are guaranteed to fail! It's just a matter of time! As the years pass, the chance of a failure increases until it approaches 100%, if not by deterioration then maybe by an earthquake. We have an example of such a failure. The RR built a "soil remediation cell" in the RR gravel pit at mile 388. They were required to put in a double liner. The top liner was to contain the soil and any leachate from the soil. The bottom liner was to be a failsafe should the top liner fail. It was built so that the area between the liners could be checked for any liquid that had breached the top liner. In less than a month liquid was found in this interstitial area indicating that the top liner had already failed. The cell is still there and has not been used again since the initial diesel soil was placed there.

This monofill/landfill will generate revenue for the RR and profits for Central Monofill Services, Inc. What will the City of Anderson or the Denali Borough gain from this operation? If something goes wrong who is left with the hazardous material? Could this become another "Superfund Cleanup Site"? There is already one on Fort Wainwright and another on Eielson AFB.

This monofill/landfill will be permitted and regulated by the Alaska Department of Environmental Conservation. This is no guarantee that the monofill/landfill will be safe and not a health hazard. If government agencies are so good at overseeing and regulating why are there so many superfund cleanup sites? Could it be that Central Monofill Services, Inc. goes to the bank with a bag of cash while Anderson and Denali Borough are left holding a bag of trash?

The Denali Borough landfill is operated as a nonprofit to provide a service for the area. It was designed to break even. However, it has not always been able to do so. The monofill/landfill will be operated to make a profit. This means that the focus will not be on what is best for the community but what is best for the bottom line.

As Nancy Reagan once said, when asked how to handle a certain problem, "Just say no!"

Sid Michaels, Mile 280 Parks Highway

Director, Real Estate, Alaska Railroad Corporation
P. O. Box 107500
Anchorage, Alaska 99510-7500

Mary Beth Michaels
Mile 280 Parks Highway
HC 66, Box 28000
Nenana, AK 99760
4 May 2016

Dear Mr. Jaques:

It has come to my attention that there is a frightening plan for the Railroad gravel pit area at mile 388 on the Railroad. I live very close to this area (as do many other people), and I am very familiar with the pit and the area surrounding it, and with the people who live very close to it. I have not talked with a single person in my area who thinks this is anything but a terrible idea. Nobody wants the clean pit turned into a huge pile of harmful junk, junk which it is known will contain some toxic substances. We do not want to end up being added to the Superfund cleanup site list along with the other nine or ten sites in Alaska. This list names many US military bases in the state, including all of the largest bases. There is no need to add Clear to our national problem.

First, no one here has heard a word about this until just a few days ago. Your deadline of 25 May 2016 for comments from the public is coming too soon. People need more time to understand the plan, to research its history and its future, and to give it all some serious thought. We need more time. We need more time.

Second, we have not seen a meaningful map. This is very important to the local community. The fact that no one has tried to give us a truly useful map makes me think that you don't have one, and that your plan is still half-baked. It seems that you need more time too. (And your suggestion that we drive almost 300 miles to Anchorage to see a map that may or may not be accurate is not reasonable.)

The plan, as I understand it is to tear down the old radar site at Clear and move it all to the Railroad gravel pit site. I have visited the old radar site, and having lived here for a few decades I know a little bit about it. There are several dangerous things there that should not go into the gravel pit area. First, the buildings contain a large amount of asbestos, a dangerous cancer-causing substance. Second, I know that in the past there were polychlorinated biphenyls (PCBs) at the site, which have caused trouble in Anderson in the past. There are rumors of a large amount of lead paint, chemical solvents, and mercury. There are probably also some or all of these items: chlorinated solvents, volatile organic compounds (VOCs), pesticides, a variety of metals, trichloroethylene (TCE), and many others.

The idea of building a Class I landfill here is not helpful. We already have our own landfill, built and maintained by Denali Borough. We are content with that. We do not want to be a giant trash can for the whole state.

The recent news from Flint, Michigan makes me realize that we are lucky enough to have a very clean and healthy aquifer here. The water runs from the mountains straight under the gravel pit and then under many populated areas. There is no good reason to endanger the water, the population, the wild life and the local flora. All of us depend on it, and we would like that to continue into the future. (I do not believe it is truly possible to put a permanent liner into a landfill. I have seen one that was full of holes. It was not replaced or properly repaired or monitored, as had been promised. I expect most of them are like this one.) Class I

I have a couple of suggestions. First, The original "dump" at Clear could be remodeled and used for this one purpose, to take care of the base's problem. Second, Wainwright, Eilson, Fort Richardson and Elmendorf all probably have places that would be suitable for additional military discards. They are all on the railroad line (for ease of transport), and they all already have their own Superfund clean up sites. They would know what to do. Three (and I like this best of all), a lot of the old radar site at Clear is now a historic and interesting part of the Cold War. Much of the old site could be saved and used for historic purposes. Visitors and students would enjoy learning about the history of Alaska in World War II, and so on. Every other base I have ever visited has taken advantage of its own historic sites to enhance its important place in history.

There are many other ideas that are worth looking into. To rush into something that everyone will later regret is not a good idea. I have a lot of other ideas myself, but this is enough for now. Please give this more thought, a lot more thought. Your current plan is full of flaws, and there are so many other good and logical options to consider.

Sincerely,

Mary Beth Michaels

CC

AKRR Board of Directors: John Binkly, Marc Luiken, Chris Hladick, Linda Leary, John Cook, Jack Burton, Governor Bill Sheffield

AKRR Executives: William G. O'Leary, Barbara Amy, Doug Engerbreston, Clark Hopp, William Hupprich, James W. Kublitz, Wendy Lindskoog, James Ratchford, Wileen Reilly, Dale Wade

Central Monofill Services: Stuart M. Jaques, Shane Durand

Alaska Government: Dave Talerico, Click Bishop, Bill Walker, Byron Mallott

Congress: Lisa Murkowski, Dan Sullivan, Don Young

Denali Borough: Clay Walker, Don DeBlauw, Paddy Tatum, Kesslyn Tench

City of Anderson: Samantha Thompson

Alaska Dispatch News

War of words over proposed debris-recycling landfill near Palmer

- Author: Zaz Hollander
- Updated: October 29, 2014
- Published October 29, 2014

WASILLA -- An Anchorage company is making another run at a building debris recycling and disposal site near Palmer, the same site rejected last year by the Mat-Su Borough planning commission. Central Environmental Services operates Central Recycling Services and Central Monofill Services, the company behind the proposal to landfill shredded debris including asbestos at a 120-acre former gravel pit at Mile 38 Glenn Highway near the Matanuska Lakes State Recreation Area.

Central Recycling in 2012 made more than $3.5 million selling steel, crushed asphalt, concrete and glass from demolition and construction sites to Seattle and Alaska markets. It also generates roughly 8,000 tons of waste a year and wants a break from Anchorage municipal landfill fees.

Mat-Su planning commissioners in a 4-3 vote last year rejected Central's original monofill proposal, citing concerns about groundwater protection and blowing litter in the windy pit. Residents of nearby subdivisions -- a 2010 study showed nearly 50 wells in the area -- waged a noisy opposition campaign. Also last year, the borough issued six citations charging Central with illegal dumping after the company deposited some shredded material at the site before any permit was approved. The borough Assembly changed the trash code to make sure Central's operations were covered. The illegally dumped material wasn't trucked out until September, after the Alaska Department of Environmental Conservation got involved.

A public comment period for the company's second conditional-use permit application closes Friday. The planning commission will review the application in December.

The company's proposal is essentially the same as the first one, officials say.
Central co-owner Shane Durand said the problem last year wasn't the proposal itself but a lack of "clarity" on five or six points that troubled planning staff. This year's 1,031-page application packet has more hydrological studies and water quality information but basically, Durand said, the proposal is the same.

"Really, the design and the whole function of the facility, the operation, that hasn't changed," he said. "We've just provided more substantiating information and more clarity."

Monofills are less regulated than traditional waste landfills. Federal studies have linked some in Ohio to suspected carcinogens and those in multiple states to hydrogen sulfide gases.They're generally considered by regulators to be one kind of waste -- that's why they're called monofills -- with a low potential to pollute air or water.

But critics of Central's proposed Palmer monofill say it does threaten to pollute area wells and lakes given the unpredictable water table left by gravel operations that punched through the underground aquifer and the potential for contaminants to travel off the property.

Richard Harbuck, a member of the Palmer Toxic Dumping monofill opposition group as well as the local Gateway Community Council, said the concern is that Central will get a permit this time around despite the lack of substantive changes in the application.
"They're basically just doing round two," Harbuck said."Unfortunately, out here in the Valley, they're allowed to reapply for a permit over and over until finally they bust the door down."
The community council last year submitted a letter saying the site was the wrong place for a monofill, and it plans to submit another letter this week, he said.

"We don't feel this is the proper place for this type of activity given the nature of the gravel pit, the hydrology, and the wind problems associated with it, and the basic proximity to an established community," he said.

Opponents also question the company's ability to self-regulate, given Central's compliance record last year. Central, however, says opponents are making too big an issue of the company's brief history in the Mat-Su.
"A lot of people are skewing what happened to the negative, making it seem a lot worse than it really is," Durand said.

The company last week sent out mailers to 5,000 to 6,000 Valley residents in a wide circle around the fill site urging them to "Support Recycling in Alaska" and go to the company website for more information. The flier includes a link to the permit application and the admonition, "Don't let misinformation and stereotypes form your opinion ... Get the facts!" above the company's phone number in Anchorage.

Durand said Central's mailer came in response to a flier circulated more locally by Palmer Toxic Dumping warning of poisoned wells, contaminated fish and windblown trash. That flier shows photos of trash and an aerial view of the proposed monofill location amid the numerous lakes of the Kepler-Bradley system. "Can there even be a worse location for a dump?" the brochure reads. "Homes, Wells, Fishing, Scenic Byway & Gateway to Palmer."

The material Central hopes to dispose of at Palmer includes everything from carpet and drywall to asbestos. Some of the asbestos will fall under state regulations that require special precautions like heavy bags, cover to make sure the toxic dust doesn't reach the air and a special cell to hold it.

The company plans to erect portable "catch" fences to snag windblown debris, according to the application. Monofill cells will be contained by soil or tire bales.

In Alaska, the state doesn't require liners to protect groundwater or monitoring wells to check for contamination. Central says it plans to make use of wells but not liners.

Alaska Dispatch News

Published on *Alaska Dispatch News* (http://www.adn.com)

Zaz Hollander [1]
March 26, 2015

Development on Eklutna Inc. land next to Chugiak's popular Loretta French park will proceed without a contentious construction and demolition debris landfill.

The Alaska Native corporation last week announced it had eliminated the so-called "monofill" from its planned community district master plan proposal for the 68-acre property. The decision reflects ongoing discussions between Eklutna and Anchorage municipal officials after tests last year revealed contamination from the old Peters Creek dump may be leaking onto the proposed monofill site.

Until the "potential trespass contamination matter" is resolved, Eklutna said in a statement, it isn't pursuing the monofill.

The Anchorage Assembly on Tuesday approved the Eklutna master plan that sets the stage for future development on the property. A number of audience members and several Assembly members thanked Eklutna for removing the monofill as a permitted use.

Eagle River Assembly representative Bill Starr said he appreciated Eklutna's land stewardship and flexibility.

"We worked it hard, some behind the scenes, some in front," Starr said.

Some 800 people signed a petition against the Chugiak fill, according to Chugiak Community Council secretary Jake Horazdobski. He cautioned the Assembly to make sure the monofill was "truly deleted" from the Eklutna plan.

The decision to mothball the monofill marks the second apparent setback for the company proposing it and another one near Palmer: Central Monofill Services is affiliated with Central Recycling Services, the company that runs a successful industrial recycling operation at Ship Creek.

The Matanuska-Susitna Borough Planning Commission in December rejected the Palmer monofill [2] in a tie vote, after scores of area residents testified about the risk for underground fires, potentially fouled drinking water wells and wind-blown trash or asbestos dust.

Central is hoping for a reversal of the commission decision from the borough's five-member Board of Adjustment and Appeals. A hearing on the company's appeal is scheduled for 10 a.m. Tuesday at the borough building.

Central officials have called both sites necessary to take at least 8,000 tons a year of debris they can't recycle but that is becoming too costly to dispose of at the Anchorage landfill. Monofills can contain building materials including plywood, carpet, wiring and Sheetrock. Central also hopes to dispose of asbestos in special cells at the Palmer site, located above an unpredictable water table a few miles from the city along the Glenn Highway.

Monofills are lightly regulated by the state because officials say they pose a lower potential to pollute air and water than traditional garbage landfills. The Alaska Department of Environmental Conservation is reviewing a permit request from Central for the Palmer site, according to an email from Lori Aldrich, the department's regional solid waste program manager. DEC is currently researching information from 86 comments about the monofill permit application.

The Palmer permit decision will take at least another three months, Aldrich said.

Central put its DEC application for the Chugiak site on hold.

Central officials did not testify before the Assembly on Tuesday night. Contacted Wednesday morning, Central co-owner Shane Durand said the Eklutna property is the company's only potential monofill site in the Chugiak area.

Asked about the company's plans now, Durand referred questions to "our partner," Eklutna CEO Curtis McQueen.

McQueen was attending a day-long forum and couldn't be reached for comment Wednesday.

Eklutna is the largest private landowner in the Anchorage Bowl. The master plan for that Chugiak parcel includes a list of allowed uses that range from housing and industry to a golf course, a fitness center and animal boarding.

Numerous Chugiak residents and community council officials thanked Eklutna for pulling out the monofill but said they still had concerns about what they described as a lack of detail in the plan.

The plan includes only five uses that don't require additional review or a conditional-use permit, according to DOWL consultant Tim Potter: a community garden, a public or private park, a community or police substation, a "stealth design" transmission tower and a farmers market.

"Everything else has to go through the public review process," he said.

Source URL: http://www.adn.com/article/20150326/controversial-monofill-pulled-eklutna-plan-land-near-chugiak-park

Links:
[1] http://www.adn.com/author/zaz-hollander
[2] http://www.adn.com/article/20141216/palmer-monofill-rejected-mat-su-planning-commission