

Appendix E3 – Hazardous Waste Plan



NANA Regional Broadband Network Project

Hazardous Waste Plan

NANA Regional Corporation, Inc. (NT23TBC0290014)

NANA Region Middle Mile Fiber Optic Project

Northwest Arctic Borough, Alaska

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1 Hazardous Waste Plan

All waste and hazardous substances handling will follow applicable federal, state, and local regulations, with detailed tracking and records throughout the process.

1.1 Waste Types, Waste Sources, and Disposal Methods

All waste generated from the project will be securely contained and disposed of properly. Much of the waste will be backhauled to the Kotzebue landfill, however some waste will be transported to nearby local community landfills. When appropriate, material that can be reused or recycled will be separated and appropriately delivered to locations for community beneficial reuse or backhauled for recycling.

The following types of waste may be generated during construction:

- Solid Wastes: Excess cable, connectors, plastic spools, packaging materials, and general construction waste will be transported back to Kotzebue or backhauled to a larger landfill for proper disposal. Materials that can be reused or recycled, such as fiber optic spools, will be separated and backhauled to an appropriate facility.
- Wood Wastes: Excess wood from packaging materials, pallets, and wooden support poles will either be backhauled to Kotzebue or provided to local communities for beneficial reuse.
- Food and Domestic Wastes: Excess food and domestic waste materials generated by construction crews will be contained and transported to local community landfills for proper disposal.

1.2 Hazardous Substances

Hazardous substances necessary during construction will be stored within traveling equipment securely away from sources of heat, sparks, and flames and within secondary containment structures. The storage area will be cool, dark, and well-ventilated. Hazardous substances traveling with the construction crews will include:

- Diesel Fuel: Stored in double-walled 5,000-gallon fuel sleighs with appropriate dispensing systems and spill prevention measures.
- Gasoline Fuel: Approximately 110-gallons of unleaded gasoline will be stored in polyethylene drums, with secondary containment, for use in generators and other equipment as needed. Appropriate dispensing systems and spill prevention measures will be used when transferring gasoline.
- Hydraulic Oil: Stored in properly labeled and secured stainless steel or polyethylene drums within traveling equipment or mobile camps, with secondary containment provided. Approximately 200 gallons of oil will be consumed per month of construction.
- Antifreeze, lubricant, windshield washer fluid, and brake cleaner: Small quantities (approximately 5 gallons each) of these preventative maintenance fluids will be stored in properly labeled and secured containers with secondary containment.

- Lead acid batteries: Two 12-V lead acid batteries will be on-site to start and power various equipment. Care will be taken when handling batteries, and they will be securely stored away from other fluids.
- Drill fluid (i.e., drill mud): For the HDD activities, a bentonite-water mixture will be used to stabilize the borehole, lubricate the drill bit, and transport cuttings to the surface. This fluid will be mixed as needed for daily drilling activities using the bentonite powder and clean water. Bentonite will be stored in dry sacks. HDD activities will be performed in the summer as noted previously.

The following types of hazardous waste may be generated during construction:

- Used Oil and Lubricants: These liquids will be collected in sealed containers and transported to Kotzebue for proper hazardous waste disposal. Approximately 25 gallons of used oil and lubricants will be generated during each month of project construction.
- Used oil and lubricants will be stored in a structurally sound and leak-proof 55-gallon drum that is made from polyethylene.
- Fuel Residues and Spills: In the event of a spill, contaminated soils or absorbent materials will be stored in separate containers and stored securely until their proper disposal.

1.3 Spill Plan and Spill Prevention

Effective spill prevention and response measures will be implemented during project construction. Implementation measures include:

- Proper handling and storage, such as secure and appropriate containers for each substance and safe transportation, limited storage, and strategic placement of hazardous materials to minimize spill risks.
- All hazardous materials will be stored within a secondary containment structure.
- Hazardous substance transfers will always take place within a containment berm and/or while utilizing a drip pan. Absorbent materials will be readily available during transfer.
- All containers will be clearly labeled.
- Daily inspection of all storage areas, containers, and equipment will occur to look for signs of leaks, corrosion, or other issues. Preventative maintenance on tanks, valves, or pumps will be performed regularly.
- Daily record keeping of inspection activities, and maintenance of accurate records when materials are stored or disposed of.
- Spill kits will be readily available at all work sites and in all vehicles containing absorbent materials, contaminated chemical waste bags, gloves, and brooms.
- Personal Protective Equipment, including gloves and safety glasses, will be readily available.
- Key personnel will be trained in spill response management and all personnel will be trained in spill response procedures.
- Any spills will be immediately reported to appropriate agencies.

The development of several plans/policies are anticipated to guide construction activities. These will be provided through the NEPA analysis stage of the project and may include the following:

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- Waste Handling Plan
- Wildlife Interaction Plan
- Cultural Resources Orientation and Management Plan
- Weed Control/Invasive Species Management Plan
- Stormwater Pollution Prevention Plan (SWPPP) Purpose: This plan outlines procedures to prevent, monitor, and respond to inadvertent drilling fluid releases (frac-outs) during HDD activities.