


ALASKA LNG PROJECT	DOCKET NO. CP17-___-000 RESOURCE REPORT NO. 8 APPENDIX I – UNANTICIPATED CONTAMINATION DISCOVERY PLAN	Doc No: USAI-PE-SRREG-00- 000008-000 DATE: APRIL 14, 2017 REVISION: 0
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**APPENDIX I UNANTICIPATED CONTAMINATION DISCOVERY
PLAN**



**UNANTICIPATED CONTAMINATION DISCOVERY
PLAN**

USAI-P2-SPZZZ-00-000005-000


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Plan Status

The following plan is a Draft *Unanticipated Contamination Discovery Plan* (Plan) that covers the processes that would be followed by the Project entity in the event undocumented or unanticipated contaminated material were encountered during construction. The final Plan will address the specific mitigation measures committed to by the Project entity in the event contamination were discovered during construction. The contact information would be updated prior to construction when contractors and Project entity staff have been identified.

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1.0 INTRODUCTION

This Draft *Unanticipated Contamination Discovery Plan* (Plan) is intended to provide guidance to ensure worker and public safety as well as prevent the spread of further contamination in the event that waste and/or contaminated soils (as defined in applicable federal, state, and local regulations and guidelines) are encountered during construction of the Project. Whereas preconstruction planning has avoided known hazardous and non-hazardous material sites, other undocumented sources of contamination could be encountered during construction.

1.1 PURPOSE AND SCOPE

1.2 OBJECTIVES

The objective of this Plan is to prescribe measures for safely addressing unanticipated, potentially hazardous¹ wastes found during construction of the Project. If such materials are encountered during construction, the actions contained in this Plan provide measures that the Project entity and its contractors would undertake.

1.2.1 Project Responsibilities

The Project entity would be responsible for identifying and delineating known documented hazardous waste and/or contaminated sites ahead of construction, and taking appropriate action to avoid these sites or mitigate them. In the event of an unanticipated discovery, the Project entity would be responsible for:

- Notifying the appropriate agencies/authorities.
- Providing guidance to the Construction Contractor (Contractor).
- Ensuring that the site is secure.
- Engaging specialized waste contractor(s) to characterize discovered wastes and to implement subsequent response actions as negotiated with the landowner and the Alaska Department of Environmental Conservation (ADEC) and/or the U.S. Environmental Protection Agency (EPA).


1.2.2 Contractor Responsibilities

The Contractor shall be responsible for implementation of the initial response procedures contained in Section 2.1 of this Plan.

1.3 SCOPE

This Plan shall be effective during all construction phases of the Project and at all Project construction locations.

¹ Hazardous wastes are regulated by EPA Region 10 in Alaska, in accordance with Resource Conservation and Recovery Act (RCRA) regulations and are defined in 40 CFR § 261.3

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2.0 DISCOVERY

Identifying and recognizing existing hazardous materials or contaminants is the first step to initiate the proper response action. During excavation, indicators of possible contamination include, but are not limited to:

- Rusted barrels and containers.
- Stained or discolored earth, as contrasted to adjoining soil.
- Fill material containing debris unearthed during trenching or grading.
- Household trash covered by earth or other material that appears to be interspersed with industrial debris.
- Gasoline smells or other hydrocarbon odors that emanate when the earth is disturbed.
- Oily residue intermixed with earth.
- Sheen on groundwater.
- Hydrocarbon sheen on surface water.
- Cinders and other combustion products like ash.

Structures such as abandoned oil and gas lines, asbestos pipe, old transformers, and underground storage tanks also require special handling if disturbed.

2.1 INITIAL RESPONSE PROCEDURES

Immediately following discovery of potential hazardous waste or contaminants, the Contractor would:


- Cease work in the vicinity of suspected contamination.
- Cordon off or otherwise restrict access to the suspected area to protect workers and the public.
- Notify the Project entity's Lead Environmental Inspector and Resident Construction Supervisor.
- Notify the landowner of the affected parcel, if applicable.
- Await further instructions.

2.2 SITE CHARACTERIZATION AND HAZARD ASSESSMENT

The following procedures would be used to determine the extent, nature, and disposition of suspected contamination encountered by construction. These actions would be undertaken by a waste consultant (retained by the Project entity) using trained Occupational Safety and Health Administration (OSHA), Hazardous Waste Operations and Emergency Response (HAZWOPER) technicians that implement specialized personal protective equipment (PPE), sampling, and decontamination protocols approved by the Project entity.

The actions following discovery and site security would include:

- Notifying the proper authorities, as required.
- Identifying the extent of unanticipated site contamination, as required.
- Determining the worker safety and public exposure concerns.
- Characterizing the contaminant(s).
- Developing and implementing hazardous materials/waste management measures.
- Documenting the event from discovery and through the final disposition documentation.

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2.2.1 State Agency Notifications

All agency notifications would be made by the appropriate Project entity. Phone numbers for regional ADEC offices are shown in the following Table.

ADEC Area Response Team Office	Phone	Fax
Central (Anchorage)	(907) 269-3063	(907) 269-7648
Northern (Fairbanks)	(907) 451-2121	(907) 451-2362
Kenai Office	(907) 262-5210	(907) 262-2294
Outside normal business hours	(800) 478-9300	

2.2.1.1 State Lands

If contamination is found on state lands, notify the Alaska Department of Natural Resources (ADNR), Division of Mining, Land & Water (DMLW):

ADNR DMLW Regional Office	Phone	Fax
State Pipeline Coordinator ¹	(907) 269-6403	(907) 269-6880
ADNR 24-Hour Spill Report	(907) 451-2678	(907) 451-2751
Southcentral Region (Anchorage, Kenai)	(907) 269-8552	(907) 269-8913
Northern Region (North Slope, Fairbanks)	(907) 451-2740	(907) 451-2751
Alaska Mental Health Land Trust Office	(907) 269-8658	(907) 269-8905
Alaska Railroad Corporation	(800) 321-6518	N/A
Notes: ¹ Contact State Pipeline Coordinator for contamination discovered on State Park Lands. Review associated state land use permit notification requirements for additional contacts.		

2.2.1.2 Borough Lands

If contamination is found on borough or city lands, notify the appropriate office listed below:

Borough/City	Phone	Fax
Denali Borough	(907) 683-1330	(907) 683-1340
Fairbanks North Star Borough – Land Management	(907) 459-1241	(907) 459-1122
Kenai Peninsula Borough – Planning Director	(907) 714-2200	(907) 714-2378
City of Nenana	(907) 832-5441	N/A
North Slope Borough – Land Management	(907) 852-0320	(907) 852-0322
Matanuska-Susitna Borough – Planning	(907) 861-8501	N/A

2.2.1.3 Native Corporation Lands

If contamination is found on Native Corporation lands, notify the appropriate office listed below:

Native Corporation Lands	Phone	Fax
Ahtna Incorporated – Lands	(907) 771-5355	N/A

Native Corporation Lands	Phone	Fax
Cook Inlet Regional, Inc. – Lands	(907) 263-5140	(907) 263-5559
Salamatof Native Association	(907) 283-7864	N/A
Toghotthele Corporation	(907) 832-5832	(907) 832-5834
Tyonek Native Corporation – Lands	(907) 272-0707	(907) 274-7125

2.2.2 Federal Agency Notifications

All federal agency notifications would be made by the appropriate Project entity. Phone numbers for the EPA and Bureau of Land Management (BLM) offices are shown in the following tables.

2.2.2.1 U.S. Environmental Protection Agency – Region 10

EPA Region 10	Phone	Fax
National Response Center	(800) 424-8802	N/A
Alaska Operations Office	(907) 271-5083	(907) 271-3424
Region 10/Seattle Office	(206) 553-1200	N/A
Indian Lands Coordinator – Seattle Regional Office	(206) 553-6285	N/A
Notes:		

2.2.2.2 Bureau of Land Management


If contamination is found on BLM-administered lands notify the appropriate office listed below.

BLM Land Manager	Phone	Fax
Arctic Field Office	(907) 267-1246 (907) 474-2200	(907) 474-2280
Anchorage Field Office – Hazardous Materials Program	(800) 437-7021 (800) 478-1263	(907) 267-1267 N/A
Central Yukon Field Office	(907) 474-2200 or (800) 437-7021	(907) 474-2280
Fairbanks District Office	(907) 474-2200 or (800) 437-7021	(907) 474-2280

2.2.3 Hazard Assessment

The Project entity would engage a specialized waste consultant to identify and characterize the contamination through sampling and analytical testing. The objectives of the consultant's investigation, in consultation with the landowner, would include:

- Devising a plan for additional site-specific investigations as necessary.
- Determining the characteristics of the soil, groundwater, and vapor (e.g., groundwater recovery rates; vertical and horizontal extent of contamination; chemicals of concern; etc.).
- Determining the handling and/or disposal requirements for any contaminated media unearthed as part of the construction process or if the site should be avoided with a reroute.
- Recommending a preventive action plan to ensure the problem is not aggravated and to minimize liability.


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- Determining the requirements necessary for the construction contractor to resume work in the area.

A waste consultant may also be employed to develop special construction specifications to complete portions of the Project within or around contaminated areas. The data obtained from the investigation would also enable the consultant to develop in consultation with the landowner special site closure specifications related to groundwater treatment or filtration systems; ventilation systems; ongoing site monitoring; contaminated material disposal or reuse options; and permitting.

2.2.4 Mitigation Measures

The final disposition of contaminated soils and/or water (groundwater, surface water) would be determined through discussions with the jurisdictional agencies and affected landowners. Depending on the extent and characteristics of contamination identified, the Project entity would first seek a realignment to avoid encountering further contamination. If such a move is infeasible, plans for excavation or reducing the contamination and disposing at an approved waste disposal site would be developed with the landowner and ADEC, or with input from EPA if the site were characterized as hazardous.

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3.0 RECORDKEEPING AND REPORTING

Documentation of the unanticipated contamination discovery would start with the details associated with initial discovery and end with the final disposition of the waste materials following the appropriate agency approvals. Records would also be kept in accordance with the *Project Waste Management Plan*.

3.1 PROJECT ENTITY RESPONSIBILITIES


The Project entity would document steps involved from initial discovery through final disposition, and written approval by agencies, including:

- Detailed description of initial discovery.
- Initial response actions.
- Establishment of site security.
- Agency contacts.
- Waste management consultant engagement.
- Site investigation by waste management consultant.
- Sampling, chain of custody, and laboratory results.
- Agreed-upon activities to resume Project construction or to avoid the site.
- Site assessment and/or removal of contaminated materials in the construction area by the waste management contractor (e.g., burial or exhumation and offsite disposal).
- Secure copies of any transport manifests and delivery receipts.
- Site closure verification and concurrence (by regulatory agencies).

The level of associated documentation from initial discovery through final resolution would depend on the extent of discovered contamination, the potential toxicity of contaminants, and degree of further disturbance of the contaminated site by construction activities.

At a minimum, the Project entity would record the following information when unanticipated contamination is discovered:


- The time and place of discovery.
- Actions taken to secure the site from further disturbance or human exposure.
- The extent of disturbance of the site by construction.
- The description of discovered substances (visual and odors).
- Additional actions taken in response to the discovery.
- Notifications made in response to the discovery.
- Sampling performed and analytical testing results.
- Site closure plans.
- Actions taken to secure contamination in place or at the treatment, storage, or disposal facility.
- Actions taken to redirect or complete construction.

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3.2 CONTRACTOR RESPONSIBILITIES

The Contractor would cooperate with the Project entity by providing all pertinent and detailed information regarding the initial discovery.

If directed by the Project entity, the Contractor may be required to develop a Decontamination Plan that includes guidance on the procedures for decontaminating materials and equipment that directly come in contact with the contaminated materials.

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4.0 ACRONYMS AND TERMS

Term	Definition
ADEC	Alaska Department of Environmental Conservation
ADNR/DMLW	Alaska Department of Natural Resources Division of Mining, Land, and Water
BLM	Bureau of Land Management
Contractor	Construction Contractor
EPA	United States Environmental Protection Agency
HAZWOPER	Hazardous Waste Operations and Emergency Response
OSHA	Occupational Safety and Health Administration
Plan	Unanticipated Contamination Discovery Plan
PPE	Personal protective equipment
Project	Alaska LNG Project
RCRA	Resource Conservation and Recovery Act