

**RCRA COMPLIANCE PLAN
EAST COLLEGE ROAD PROJECTS
PROJECT NOS. NFHWY00645 AND NHWY00591
FAIRBANKS, ALASKA**

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Central Accumulation Area Inspection Form



ACRONYMS AND ABBREVIATIONS

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
ATT	Transport, Treatment, & Disposal Approval Form for Contaminated Media
CAA	central accumulation area
CFR	Code of Federal Regulations
DEC	Alaska Department of Environmental Conservation
D.O.T.	US Department of Transportation
DOT&PF	Alaska Department of Transportation and Public Facilities
EPA	US Environmental Protection Agency
HW	hazardous waste
ID	identification number
LQG	large quantity generator
OSHA	Occupational Safety and Health Administration
PCE	tetrachloroethene
POC	point of contact
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
TCE	trichloroethene



1.0 OVERVIEW

1.1 Site Conditions / Site History

This RCRA Compliance Plan applies to two projects being constructed currently on the eastern portion of College Road by the Alaska Department of Transportation and Public Facilities (DOT&PF). The *East College Road Resurfacing Project* (#NFHWY00645) will resurface College Road between the Antoinette Avenue/Margaret Avenue intersection and the Old Steese Highway as well as the on- and off-ramps of the Johansen Expressway. The *Northern Region ADA Improvements-Fairbanks: College Road Project* (#NFHWY00591) includes additional sidewalk regrading and surface replacement to bring the full sidewalk into ADA compliance from Antoinette/Margaret to the Steese Highway. This RCRA Compliance Plan is applicable to both DOT&PF projects, which are collectively referred to in this document as the *East College Road Projects*. The project is adjacent to known current and former petroleum-contaminated sites, in addition to tetrachloroethene (PCE) and trichloroethene (TCE) contaminated sites. Areas of suspected impact are identified in the project Quality Assurance Project Plan (QAPP) included with the project bid documents.

Dilution of hazardous waste (HW) does not remove the requirement to manage the HW under federal regulation 40 CFR 268.3. On a site-by-site basis the EPA may allow soil or water mixed with a waste to be allowed to return to the ground. This decision would be recorded in a "contained-in determination" letter by the EPA. As of the writing of this plan, no "contained-in determination" letter has been granted for this site. All soil that contains any detectable concentration of PCE or TCE will be considered HW from the F-List of 40 CFR 261 and will be required to be transported to a Subtitle C (hazardous waste) landfill for disposal.

1.2 Contractor Responsibility and Regulatory Framework

The contractor is responsible for the day-to-day management and handling of the waste and accumulation area in accordance with the RCRA regulations including submission of documents to DOT& PF as specified in Section 8 of this plan. Alaska DOT&PF is responsible for the management of administrative portions of the RCRA compliance including bi-annual reporting and coordination with the EPA.

The contractor is responsible for ensuring compliance with all federal, state and local regulations pertaining to the management of HW and this compliance plan for all HW generated by the contractor. The most stringent requirement will be applied for any contradictions in the applicable regulations or this plan. The contractor may exceed the requirements in the regulations or this plan, however the contractor may never do less than is required by the regulations. This includes but is not limited to the following regulatory framework:

Hazardous Waste: 40 CFR parts 261-266, 268, 272, 279

DOT: 49 CFR 171-180

ADEC: 18 AAC 62, 75

This compliance plan has been prepared to assist the contractor with application of the regulations to the *East College Road Projects*, summarizing the relevant regulations and to assist with contractor employee training. The contractor is responsible for compliance with federal, state and local regulations.



2.0 EPA ID NUMBER (40 CFR 262.18)

The Environmental Protection Agency (EPA) identification (ID) number is required prior to any work that includes generation, treatment, accumulation, disposal, or transportation of HW.

The request for the EPA ID for this project was submitted on October 25, 2022, and the following EPA ID number was assigned to this site.

Site Name:

Alaska DOT&PF East College Road Resurfacing

EPA ID Number:

AKR000209957

Location:

LAT: 64.850786

LONG: -147.703797

Current Federal Generator Status

Small Quantity Generator

DOT&PF will register the site as a Large Quantity Generator with the EPA prior to soil disturbance for the project.

3.0 GENERATOR CATEGORY (40 CFR 262.13)

Excess soil that will be treated as suspect HW for this project is expected to consist of non-acute HW that is contained on the RCRA “f-list”.

Construction activities are anticipated to generate excess soil containing HW throughout the construction project. Based on Table 1 (40 CFR 262.13) and anticipated quantities generated greater 1,000 kg the site will be considered a **Large Quantity Generator (LQG)** for each month of generation.



4.0 CENTRAL ACCUMULATION AREA REQUIREMENTS (40 CFR 262.17)

The contractor is responsible for compliance with all federal, state and local regulations regarding the accumulation of HW (including soil and/or water containing HW).

Hazardous waste (including soil or water that contains HW) may be temporarily accumulated on site without a permit, provided that the conditions listed in 40 CFR 262.17 “Conditions for exemption for a large quantity generator that accumulates hazardous waste” are adhered to in a Central Accumulation Area (CAA). These requirements include, but are not limited to, the following:

- HW may remain in the accumulation area no longer than 90 days. An extension of up to 30 days may be applied for in the cases of unforeseen, temporary, and uncontrollable circumstances. Time tracking is performed on each separate HW management unit (container or stockpile) within the CAA and begins accruing the moment that any quantity of waste enters the HW management unit. Time tracking continues from this original date even if additional waste is added to the HW management unit at a later date.
- The contractor shall inspect all accumulation areas with HW present at a minimum of once every seven days.
 - A time period elapsing of seven days or more in-between inspections will be considered a violation of this requirement regardless of holidays, contractor hardship or schedule conflicts.
 - The inspection will be performed by a trained representative of the contractor who will physically inspect the condition of each containment area and fill out the inspection form included in Appendix A. Copies of the inspection form must be submitted and retained as specified in Section 8 of this plan.
 - If any spills or leaks are detected in the HW containment the contractor will immediately correct the deficiency. The contractor will report spills and leaks of hazardous material to ADEC as specified in Section 4.1 of this plan.
 - DOT&PF will perform an inspection of the accumulation area once per week in addition to the contractor’s inspection.
- HW must be stored in HW management units (containers or soil stockpiles) that are protective of the environment and comply with federal, state and local regulations. Soil stockpile requirements are listed in the project QAPP.
- HW container/stockpile requirements include the following:
 - HW containers/stockpiles must be kept in good condition and be compatible with the contained waste.
 - HW containers/stockpiles must be kept closed during accumulation, except when adding, removing, or consolidating waste.
 - HW containers/stockpiles must not be handled in a way that causes a spill or leak.
 - Incompatible wastes must not be placed in the same container/stockpile or into a container/stockpile that previously held an incompatible waste.
- The contractor shall label HW management units as specified in Section 4.4.
- The contractor shall log HW management units as specified in Section 4.5.



4.1 Contingency Plan and Emergency Readiness (40 CFR 262.250 – 262.265)

The contractor must submit a Central Accumulation Area Emergency Contingency Plan to DOT&PF at least two weeks prior to the planned accumulation of waste as specified in Section 8. The contractor will update the plan immediately and re-submit to DOT&PF if any changes are made to the contingency plan including the designated emergency coordinator(s).

Following approval by DOT&PF the contractor’s contingency plan will be incorporated into this RCRA compliance plan. The contractor plan is not expected to be a stand-alone document.

The contractor’s contingency plan must specify the following:

- How the contractor will minimize the possibility of fire, explosion, spills, leaks, trespassing and vandalism.
 - This will include at minimum a rigid construction fence with signage that is readable from a minimum of 10 feet distance with text height a minimum of one inch tall. Fence signs will include the following text or similar:
 - “NO TRESPASSING”
 - “RCRA Hazardous Waste Central Accumulation Area”
 - “Emergency Coordinator: “ + the name of emergency coordinator
 - “Emergency Contact Number: “ + the 24-hour emergency contact number
 - “In case of emergency contact 911 and number above”
- The contractor will identify one or more emergency coordinator(s). The contingency plan will include the activities that the emergency coordinator(s) will be trained and given the authority to perform. These activities will include the following at minimum:
 - Notify facility personnel of the emergency.
 - Notify appropriate state or local agencies if their help is required.
 - Identify the character, source, and amount of any released materials.
 - Access possible hazards to human health or the environment.
 - Direct project employees to cleanup a spill or leak.
- The contractor will provide contact information for the emergency coordinator(s) in the contingency plan. The contractor will amend this plan immediately and re-submit if there is a change in emergency coordinator personnel.
- Available equipment and personnel that could respond to an emergency. Recommended equipment listed is loaders, dump trucks, spill kits and vehicle fire extinguishers.
- The plan will comply emergency coordinators to contact local emergency response officials in the following manner:
 - In case of fire, extinguish or call fire department (911).
 - In case of spill, the contractor will collect the soil and replace into containment using mechanical equipment and/or manual labor, directed by the emergency response coordinator. Spills to the environment must be reported to the ADEC spill notification line (1-800-478-9300) immediately.

4.2 Personnel Training (40 CFR 262.17(a)(7))

The contractor must provide employees classroom or on-the-job training on the requirements to maintain compliance with RCRA waste requirements. This training must be directed by a person trained in HW management procedures relevant to the positions in which they are employed. At a minimum the training program must be designed to ensure that project personnel are able to respond effectively to emergencies by familiarizing them with emergency procedure, emergency equipment, and emergency systems.

The contractor shall document training activities to include the following:

- Job title for each applicable project position and employee name.
- Job description for each applicable project position including qualifications and education requirements.
- Written description of type and amount of both initial and continuing training administered for each position.
- Records that document that the training or job experience required under the above items has been given to and completed by project personnel.

The contractor must maintain and submit updated training records as specified in Section 8 of this plan.

4.3 Accumulation Closure (40 CFR 262 17(a)(8))

The contractor must notify DOT&PF within 24 hours of closure of the waste accumulation unit (i.e. container storage area).

DOT&PF will place a written notice in the operating record (project retention records) when closing a waste accumulation unit within 30 days of closure.

4.4 Waste Accumulation Container Labeling Requirements (40 CFR 262.17(a)(5))

Containers must be marked or labeled in a manner that ensures the label is easily readable and visible during inspection. Labels must include the following:

- The words “Hazardous Waste”
- Indication of the hazard – 40 CFR 262.17(a)(5)(i)(B) (includes placard)
- Contents of the container (i.e. chlorinated solvent contaminated soils)
- Container ID or drum number
- Contractor point of contact and phone number
- DOT&PF point of contact and phone number
- Accumulation start date (dated the moment any amount of waste enters container for the first time)

Containers must be labeled with a placard consistent with US Department of Transportation requirements at 49 CFR part 172 subpart F.



Example placard (Miscellaneous Dangerous Goods)



4.5 Hazardous Waste Management Units Inventory Requirements

The contractor must track inventory of all HW management units in an inventory log. The updated inventory log must be submitted with the weekly inspection sheet to DOT&PF as specified in Section 8. The inventory log shall contain the following information at minimum:

- Container ID
- Container type
- Contents (i.e. PCE/TCE assumed or suspect contaminated soil)
- Source location decision unit
- Estimated volume
- Accumulation start date
- Date removed from CAA (upon removal)
- Manifest tracking number for container (once assigned)

HW management units shall never be removed from the log. Instead, the log will be a running tally of all HW management units at the project site. The log will be retained by DOT&PF as specified in Section 8 as part of the site operating record.

Soil that is directly loaded and hauled away will still be added to the inventory log. The contractor shall note on the log that the accumulation start date is not-applicable, and soil was directly loaded and hauled away.



5.0 CHARACTERIZATION OF HAZARDOUS WASTE (40 CFR 262.11)

Hazardous waste determinations will be made in accordance with either Section 5.1 or Section 5.2 below. Soil determined to not be HW shall be managed as described in the project QAPP. In all cases HW determination documentation and waste profiling documents must be submitted to DOT&PF and retained in accordance with Section 8 of this plan.

5.1 Contractor Characterized Waste

The contractor will conduct sampling of suspect soil containers and stockpiles in accordance with the project QAPP. All soil from that is found to contain any detectable concentration of PCE or TCE will be considered HW from the F-List of 40 CFR 261.31 and will be required to be transported to a Subtitle C (hazardous waste) landfill for disposal.

If no F-listed waste is detected from any of the samples associated with the decision unit, then the soil in the decision unit will not be considered a RCRA hazardous waste.

5.2 Pre-characterized Waste

Certain portions of this project have been previously characterized through existing sample results. Soil in decision units 15a, 15b, and 15c are known from past sampling to contain HW contaminated soils as identified in the project QAPP. Sample results for this area will be provided to the contractor by DOT&PF to complete waste profiling. Soil from these areas may be directly loaded into shippable containers for transportation to a Subtitle C (hazardous waste) landfill for immediate disposal following completion of the waste transport manifest documents as specified in Section 6.2.2. No additional testing for this soil is expected.



6.0 TRANSPORT AND DISPOSAL REQUIREMENTS

6.1 Pre-transport Requirements (40 CFR 262 Subpart C)

The contractor must label, mark and placard all waste containers according to the 40 CFR 262 Subpart C – pre-transport requirements prior to transport to the disposal facility.

6.2 Transport and Disposal Requirements (40 CFR 262.20 – 262.27)

6.2.1 Transport Requirements to Haul Accumulated Hazardous Waste

The contractor will complete the EPA HW manifest form according to 40 CFR 262 Subpart B. The EPA ID and site location to be used in the manifest are located in Section 2 of this plan. Alaska DOT&PF will be listed as the generator for the HW.

The contractor will submit the manifest, sample results, and a completed ADEC “Transport, Treatment, & Disposal Approval Form for Contaminated Media” (ATT) to the project engineer at least five days prior to the scheduled shipment date. DOT&PF will submit the completed ATT form to ADEC. Upon receiving the signed manifest back from the project engineer the contractor may proceed with shipment of the HW.

The contractor will submit the bottom copy of the manifest form “Generator’s initial copy” signed by transporter to the project engineer as specified in Section 8 of this plan. The remainder of the manifest will be given to the transporter.

6.2.2 Direct Load Transport Requirements

Hazardous waste that has been pre-characterized as described in Section 5.2 from DUs 15a, 15b and 15c may be directly loaded into shipping containers and transported the same day. The contractor will coordinate with the project engineer on how to complete transportation documents in advance of the direct load and haul event. The contractor must enter all containers of soil directly loaded and hauled away into the inventory log as specified in Section 4.5.

6.3 Post Transport Waste Manifest Requirements (40 CFR 262.42)

If the signed and completed manifest is not returned within 35 days of acceptance of waste by the transporter, the contractor shall contact the transporter and/or owner or operator of the designated disposal facility to determine the status of the HW.

If the signed and completed manifest is not returned within 45 days of acceptance the contractor shall prepare a cover letter explaining the efforts taken to locate the HW and the results of those efforts. DOT&PF will sign the cover letter and submit the cover letter and a legible copy of the waste manifest for which there is no delivery confirmation.



7.0 REPORTING REQUIREMENTS (40 CFR 262.41 – 262.43)

The following reports will be completed by DOT&PF and filed with the EPA:

- Biennial report
 - Required if site is a LQG for at least one month of an odd-numbered year.
 - Must be filed prior to March 1 of each even-numbered year and include re-notification using form 8700-12. (40 CFR 262.18(d)(2))
- LQG Exception Reporting – if the manifest with handwritten signatures is not returned to the generator in 35 days of the date the waste was accepted by the transporter, the contractor will contact the transporter and/or disposal facility to determine the status of the HW.
- LQG Exception Reporting – if manifest with handwritten signatures is not returned to the generator in 45 days of the date the waste was accepted by the transporter DOT&PF will submit an exception report to the EPA Regional Administrator. The report will include:
 - A legible copy of the relevant manifest
 - A cover letter signed by DOT&PF or the authorized representative explaining the efforts taken to locate the HW and the results of those efforts.
- Rejected shipments of HW – if shipment has been rejected by the disposal facility.
- Notification of Closure of a HW management unit.
 - DOT&PF will place a copy of the updated HW management unit inventory log in the operating record within 30 days after closure.
- Notification for closure of the facility (40 CFR 262.17(a)(8)(ii))
 - DOT&PF will notify the EPA using form 8700-12 no later than 30 days prior to facility closure.
 - DOT&PF will notify the EPA using form 8700-12 within 90 days after closing the facility.
- Any additional reports required by the EPA Administrator.



8.0 HAZARDOUS WASTE RECORDS (40 CFR 262 SUBPART D)

8.1 Contractor Submittals

The contractor will be responsible for submitting the following records to the DOT&PF for reporting and retention according to the following schedule:

Table 1: Contractor Hazardous Waste Deliverables

Document	Due date	Regulation	Authority Granting Approval	Plan Reference
Central Accumulation Area inspection form	Weekly and within 24 hours of inspection	40 CFR 262.17(a)(1)(v)	DOT&PF	Section 4.0
HW management unit inventory log	Weekly with inspection form	N/A	DOT&PF	Section 4.5
Central Accumulation Emergency Contingency Plan	2 weeks prior to planned accumulation of waste	40 CFR 262.250 – 40 CFR 262.265	DOT&PF	Section 4.1
Training Records	Within 24 hours of training session	40 CFR 262.17(a)(7)	DOT&PF	Section 4.2
Documents used to characterize waste	5 days prior to planned shipment of waste	40 CFR 262.11	DOT&PF	Section 5.0
Initial waste transport manifest form – prior to transport	5 days prior to planned shipment of waste	N/A	DOT&PF	Section 6.2
ADEC ATT form	5 days prior to planned shipment of waste	18 AAC 75.325(i), 18 AAC 75.370(b), 18 AAC 78.274(b)	DOT&PF	Section 6.2
Bottom copy of waste manifest form “Generator’s initial copy” – signed by transporter	Within 24 hours of acceptance of waste by transporter	40 CFR 262.21(f)(6), 40 CFR 262.40(a)	DOT&PF	Section 6.2
Completed waste transport manifest form – following disposal of waste OR a cover letter describing the efforts* to locate the HW and the results of those efforts	Within 45 days of acceptance of waste by transporter	40 CFR 262.42(a)	DOT&PF	Section 6.2

* Efforts to contact the transporter or disposal facility must be commenced by the contractor within 35 days of acceptance of the waste by the transporter unless the complete signed manifest has been already received.



8.2 Record Retention

DOT&PF will be responsible for maintaining the following records for three years as specified in 40 CFR 262.40:

- This RCRA Compliance Plan
- Completed inspection forms
- Updated inventory log
- CAA Emergency Contingency Plan
- Updated training records
- Documents used to characterize waste
- Waste transport manifests (most complete version received)
- ADEC ATT forms
- Reports submitted to the EPA



9.0 LIMITATIONS

This document was prepared by **NORTECH** to summarize portions of the project requirements related to the management of HW in compliance with the Resource Conservation and Recovery Act (RCRA) regulations listed in 40 CFR Parts 261-266, 268, 272, 279 of the federal code. This plan is SITE SPECIFIC for the listed project, location, site conditions, and scope of work. This plan does not constitute a complete summary of RCRA regulations. Applying this plan to other sites or portions of work without an understanding of the applicable regulations could lead to non-compliance. To remain in compliance with environmental regulations this project will comply with the complete regulations listed, as well as other federal and local regulations.



Appendix A – Forms

Central Accumulation Area – Hazardous Waste Weekly Inspection Form



Central Accumulation Area - Hazardous Waste Weekly Inspection

Project:		Month:		Year:		
Company Name:				Phone Number:		
HW Primary POC: HW Alternate POC:		Weekly Inspection (Includes 5 th week if applicable)			Comments	
Answers should be "Yes", "No" or "N/A"		1 st	2 nd	3 rd	4 th	5 th
Day						
Time						
Initials						
1. Is CAA and containers identified with proper signage?						
2. Is CAA area secure to prevent unauthorized access?						
3. Are containers in good condition?						
4. Are containers compatible with the waste stored in them?						
5. Are the containers fully closed?						
6. Do containers holding HW have labels that include the words "Hazardous Waste"?						
7. Is the hazard of the contents clearly marked?						
8. Are the contents of the container clearly described?						
9. Are the containers holding HW marked with the accumulation start date?						
10. Are container marked with container IDs or drum numbers?						
11. Does each container have a POC and phone number?						
12. Are containers located at the CAA within the 90-day time limit?						
13. Have the primary and alternate POCs completed training for hazardous waste management for this project?						
14. Does the CAA comply with the requirements for Preparedness, Prevention and Emergency Procedures? (40 CFR 262 Subpart M)						
15. Is there a marked spill kit present and does it contain proper PPE?						