



March 14, 2024

RE: Disposal of Construction and Demolition Waste in Rural Alaska

When planning for the 2024 construction season, the Alaska Department of Environmental Conservation (ADEC) Solid Waste Program wants to remind agencies, facility owners, operators, and contractors of the importance of proper management of construction and demolition (C&D) waste. Large quantities of C&D waste can be created from construction, demolition, or renovation projects of community or commercial facilities or water and sewer systems. These wastes are difficult to dispose of in rural Alaska.

It is important that you consider waste management early in the planning stages of the project and establish contact with the community and ADEC to understand your options. Disposal or leaving materials for reuse in the community **should not** be presumed acceptable and must be limited to non-hazardous materials. Prior communication and planning are essential in establishing your waste disposal or removal plan.

Disposal of waste in an unpermitted community landfill or abandoning the waste is illegal and can result in enforcement action by ADEC. Please contact the Solid Waste Program to confirm whether a landfill is permitted, can accept C&D waste, and is capable of handling the quantity of waste that will be generated.

If the local landfill will not accept the waste or is not permitted, constructing a landfill specific to your project may be a viable option. You may apply for a One-Time Inert Waste authorization, if your project meets the volume and location limitations in the authorization (found at <http://dec.alaska.gov/eh/solid-waste/permitapps/>). If your project does not meet these limitations, you may choose to apply for an individual Inert Waste Landfill permit. If none of these options are viable, the waste must be transported out of the community to a landfill permitted, willing, and able to accept the waste.

Hazardous Materials

All landfills in Alaska are required to prohibit the disposal of regulated hazardous waste and polychlorinated biphenyl (PCB) waste. As such, proper waste characterization is required for all projects that will generate construction and demolition debris being proposed for disposal in Alaska. Prior to demolition of any structure, a hazard survey must be performed and documented, and a Notification of Demolition and Renovation form must be submitted to EPA. All hazardous materials must be removed before demolition, in some cases by a certified contractor, and shipped to a facility permitted to accept those materials for recycling or disposal.

These materials may include:

- Lead-based paint
- Asbestos containing materials, such as insulation, ceiling or floor tiles, mastics, grout, roofing or siding, etc.

- Mercury in switches, thermostats, electronics, fluorescent bulbs, and other equipment
- Chlorofluorocarbons (CFCs) or other harmful chemicals in old refrigerators, air conditioners, and aerosol cans
- PCBs in transformers, lubricants, paints, caulks, and sealants
- Potentially toxic household or agricultural chemicals, including certain paints, cleaning products, and pesticides.

For additional details on materials that are suspect of containing PCBs, please refer to EPA’s *PCBs in Building Materials* guidance document: [PCBs in Building Materials - Determining the Presence of Manufactured PCB Products in Buildings or Other Structure](#)

Also, it is important to remove all your unused hazardous materials from the community. While the community may accept some unused or reclaimed construction materials for reuse, hazardous materials should be removed to limit any future liability for disposal or remediation. **No hazardous materials may be disposed in a Class III landfill by a contractor regardless of your generator status.**

Please help us support rural communities to make their landfills safer and more environmentally sound. If you are able to dispose of waste in a rural landfill, and the community does not have a fee system, please offer in-kind services to assist them by using equipment and labor to help clean up the landfill (e.g., consolidate, compact, and cover waste; haul cover material to the site; repair fences, etc.). Even small improvements can help the community work toward a healthier and safer landfill.

Please visit our webpage at <http://dec.alaska.gov/eh/solid-waste> and contact the Solid Waste Program Specialists below with any questions about proper waste disposal or landfill permitting.

Sincerely,



Robert J. Blankenburg, P.E.
Solid Waste, Hazardous Waste, and Pesticides Program Manager

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