



STATE OF ALASKA
DEPARTMENT OF NATURAL RESOURCES
Division of Mining, Land and Water

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APPLICANT ENVIRONMENTAL RISK QUESTIONNAIRE

The purpose of this questionnaire is to help clarify the types of activities you propose to undertake. The questions are meant to help identify the level of environmental risk that may be associated with the proposed activity. The Division of Mining, Land and Water's evaluation of environmental risk for the proposed activity does not imply that the parcel or the proposed activity is an environmental risk from the presence or use of hazardous substances.

Through this analysis, you may become aware of environmental risks that you did not know about. If so, you may want to consult with an environmental engineer or an attorney.

Alaska Industrial Development and Export Authority

AIDEA

Applicant's Name

Doing Business As

813 West Northern Lights Blvd.

Anchorage

AK

99503

Address

City

State

Zip

()

Alan Weitzner

Message Phone

Work Phone

Email

Contact Person

Describe the proposed activity:

The Ambler Access Project is planned as a controlled, industrial-access road approximately 211 miles long stretching from milepost 161 along the Dalton Highway to the Ambler Mining District. Please see the Development Plan for a detailed description of the activity.

In the course of your proposed activity will you generate, use, store, transport, dispose of, or otherwise come in contact with toxic and/or hazardous materials, and/or hydrocarbons? Yes No. If yes, please list the substances and the associated quantities. Use a separate sheet of paper, if necessary.

Please see the Environmental Risk Questionnaire Attachment A.

ADL # _____

Applicant Environmental Risk Questionnaire Form 102-4008A (Rev. 09/21)

If the proposed activities involve any storage tanks, either above or below ground, address the following questions for each tank. Please use a separate sheet of paper, if necessary, and, where appropriate, include maps or plats:

a. Where will the tank be located?

Fuel tanks would be located at construction camps, landing strips, maintenance stations and/or repeater sites. See attached description at Attachment A and associated maps at Attachment B.

b. What will be stored in the tank?

Diesel.

c. What will be the tank's size in gallons? 4,000 gallons

d. What will the tank be used for? (Commercial or residential purposes?)

Commercial Fuel Storage.

e. Will the tank be tested for leaks? Please see the Environmental Risk Questionnaire, Attachment A.

f. Will the tank be equipped with leak detection devices? Yes No. If yes, describe:

Please see the Environmental Risk Questionnaire, Attachment A.

Do you know or have any reason to suspect that the site may have been previously contaminated? Yes No.

If yes, please explain:

I certify that due diligence has been exercised and proper inquiries made in completing this questionnaire, and that the foregoing is true and correct to the best of my knowledge.

Applicant Signature: _____

Date: 10/20/2021

AS 38.05.035(a) authorizes the director to decide what information is needed to process an application for the sale or use of state land and resources. This information is made a part of the state public land records and becomes public information under AS 40.25.110 and 40.25.120 (unless the information qualifies for confidentiality under AS 38.05.035(a)(9) and confidentiality is requested). Public information is open to inspection by you or any member of the public. A person who is the subject of the information may challenge its accuracy or completeness under AS 44.99.310, by giving a written description of the challenged information, the changes needed to correct it, and a name and address where the person can be reached. False statements made in an application for a benefit are punishable under AS 11.56.210. In submitting this form, the applicant certifies that he or she has not changed the original text of the form or any attached documents provided by the Division. In submitting this form, the applicant agrees with the Department to use "electronic" means to conduct "transactions" (as those terms are used in the Uniform Electronic Transactions Act, AS 09.80.010 – AS 09.80.195) that relate to this form and that the Department need not retain the original paper form of this record: the department may retain this record as an electronic record and destroy the original.

ADL # _____

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Applicant Environmental Risk Questionnaire Form 102-4008A (Rev. 09/21)

Environmental Risk Questionnaire

The project would develop an industrial gravel access road a distance of 211-mile from the Dalton Highway from milepost 161 to the banks of Ambler River, using conventional energy sources (diesel and gasoline fuels). Diesel would be the primary fuel used on-site for vehicles, equipment, and power generators for construction of the road and material site development. Gasoline would be used for small engine equipment. 4,000-gallon diesel fuel tanks would be located at communications facilities at material sites.

A spill prevention and response plan would be developed to guide construction and operation activities. The plan would identify measures to reduce the potential for fuel spills, locations of spill response materials, and training of construction and maintenance staff on spill response. Applicant would also require a concentrate recovery plan similar to that developed at the Red Dog Mine to address concentrate spills.

Chemicals used in mining processes would be transported along the right-of-way. A comprehensive list of chemicals that would be used over the life of the proposed access road is not possible to identify due to the wide variety of mineral deposits in the area and the correspondingly wide range of potential processes associated with these deposits. However, a list of chemicals often used in mineral processing has been included below:

- Copper sulfate
- Hydrochloric acid
- Lime
- Methyl isobutyl carbinol
- Sodium cyanide
- Sodium diisobutyldithiophosphate
- Sodium isopropyl xanthate
- Sulfuric acid
- Zinc sulfate
- Adipic acid

Applicant has experience with an existing industrial mining access road, including involvement going back over 30 years with the 52-mile DeLong Mountain Transportation System (DMTS) at the Red Dog Mine. Experience at the Red Dog Mine indicates fuel spills are rare; only one fuel spill was reported on DMTS from 2000 to 2007 (EPA, 2009). Concentrate spills on the DMTS have also occurred, although the design of concentrate containers has improved during the time of the DMTS operations reducing the loss of concentrates during transport accidents.

Restrictions on road use would require concentrate haulers to use sealed concentrate containers to minimize the loss of concentrate during transport.

A stormwater pollution prevention plan would be developed for construction and would identify Best Management Practices (BMP) to be implemented to reduce the potential for water quality impacts. BMPs also would be incorporated for road operation and maintenance activities to

minimize potential impacts on water quality. Measures would include barriers to capture and filter stormwater at construction area boundaries, stabilization of disturbed areas as quickly as feasible, designation of specific areas for fueling, practices for drilling and driving piling and disposing of any drilling mud, and maintaining equipment to reduce the potential for unintentional releases. The operating and maintenance BMPs would be incorporated into the stipulations of the ROW permit and carried through into Applicant's contract requirements of any road operator hired by Applicant.

Applicant holds a Certificate of Reasonable Assurance from the Alaska Department of Environmental Conservation (ADEC) dated April 10, 2020, which includes the following conditions relating to fuels and hazardous materials:¹

1. Reasonable precautions and controls must be used to prevent incidental and accidental discharge of petroleum products or other hazardous substances. Fuel storage and handling activities for equipment must be sited and conducted so there is no petroleum contamination of the ground, subsurface, or surface waterbodies.
2. During construction, spill response equipment and supplies such as sorbent pads shall be available and used immediately to contain and cleanup oil, fuel, hydraulic fluid, antifreeze, or other pollutant spills. Any spill amount must be reported in accordance with Discharge Notification and Reporting Requirements (AS 46.03.755 and 18 AAC 75 Article 3). The Applicant must contact by telephone the DEC Area Response Team for Northern Alaska at (907) 451-2121 during work hours or 1-800-478-9300 after hours. Also, the Applicant must contact by telephone the National Response Center at 1-800-424-8802.
3. Runoff discharged to surface water (including wetlands) from a construction site disturbing one or more acres must be covered under Alaska's General Permit for Storm Water Discharges from Large and Small Construction Activities in Alaska (AKR100000). This permit requires a Storm Water Pollution Prevention Plan (SWPPP). For projects that disturb more than five acres, this SWPPP must also be submitted to DEC Division of Water (William Ashton, 907-269-6283) prior to construction.
4. During the work on the culverts and bridges, construction equipment shall not be operated below the ordinary high-water mark if equipment is leaking fuel, oil, hydraulic fluid, or any other hazardous material. Equipment shall be inspected and recorded in a log daily for leaks. If leaks are found, the equipment shall not be used and pulled from service until the leak is repaired.
5. All work areas, material access routes, and surrounding wetlands involved in the construction project shall be clearly delineated and marked in such a way that equipment operators do not operate outside of the marked areas.

¹ The full list of conditions in the Certificate of Reasonable Assurance, not all of which relate to hydrocarbons and hazardous materials, is available from the Applicant.

6. Fill material (including dredge material) must be clean sand, gravel or rock, free from petroleum products and toxic contaminants in toxic amounts.
7. Avoid the use of naturally occurring asbestos and sulfide minerals that cause acid drainage in cut and fill areas to the greatest extent as practicable.
8. Geotechnical investigations of material sites and excavation, along the road alignment and at locations of ancillary facilities, shall include geochemical screening and testing in accordance with the recommendations of the Global Acid Rock Drainage Guide (GARD Guide), sponsored by the International Network for Acid Prevention. The project proponent shall submit a plan for 1) geochemical characterization of acid generation potential, and 2) proper handling of material for preventing and mitigating harmful impacts of acid drainage (Plan) to DEC for review and approval. Locations containing unacceptable acid generating potential (as defined in the approved Plan) shall not be disturbed. If avoidance of those areas containing unacceptable acid generating potential material is not possible, Applicant must follow the Plan for material handling and acid rock drainage from occurring at the site. Applicant shall provide the DEC Division of Water (Jim Rypkema, 907-334-2288, James.Rypkema@alaska.gov) the opportunity to review and approve the draft Plan 60-days prior to groundbreaking.

* * *

e. Will the tank be tested for leaks?

Fuel would be stored in double-wall tanks meant to serve as secondary containment to reduce spills. Fuel storage facilities would include spill detection equipment. Tanks would be regularly inspected. Best Management Practices would be employed for storage and handling of chemicals for dust control, deicing, cleaning, vehicle maintenance, and other purposes.

* * *

f. Will the tank be equipped with leak detection devices? If Yes, describe:

Applicant holds a Certificate of Reasonable Assurance (Certificate) from the Alaska Department of Environmental Conservation (ADEC) dated April 10, 2020, which requires that Applicant take “[r]easonable precautions and controls must be used to prevent incidental and accidental discharge of petroleum products or other hazardous substances. Fuel storage and handling activities for equipment must be sited and conducted so there is no petroleum contamination of the ground, subsurface, or surface waterbodies.”

Consistent with Applicant’s obligations under the ADEC Certificate, fuel will be stored in double-walled tanks meant to serve as secondary containment, tanks will be regularly inspected and all fuel storage facilities will include spill detection equipment necessary to meet applicable regulatory requirements.





