

## **“Drain to Contain” Portable Containers & Secondary Containment Management SOP**

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### **1 Purpose and Scope**

This Standard Operating Procedure (SOP) describes management of portable containers and any associated secondary containment at Red Dog Operations for protection of stormwater as part of the Stormwater Pollution Protection Plan (SWPPP) for both the Mine and the Port, a copy of each is available in Qualtrax [Red Dog Mine Pollution Prevention Plan for Storm Water Management \(PPP\), Qualtrax #660](#) and the [Red Dog Port Best Management Practices Plan \(BMP\), Qualtrax #1548](#)

For simplicity, containers covered under the Storm water regulations and this SOP and will hereafter be referred to as part of the “**Drain to Contain**” portable containers and secondary containments program.

This program is designed to ensure proper management of chemical substances and prevent contact with stormwater, or contamination of surface water, as required of Alaska Department of Environmental Conservation (ADEC) Alaska Pollution Discharge Elimination System (APDES) Permit (discharge permit) and stormwater plans.

Red Dog has a number of programs already in place to manage oil<sup>1</sup> or other chemical containers as required by various federal and state regulations. Depending on the substance being stored, and its location, a portable container and any associated secondary containment may already fall under the jurisdiction of a different regulatory body. Only a limited number of portable containers are managed under the Stormwater regulatory umbrella and this **Drain to Contain** SOP.

#### **1.1 Portable Containers and Secondary Containment Not Included**

This SOP does **not** cover oil containers regulated under Red Dog’s State of Alaska and Federally-required oil spill prevention plans ([ADEC Oil Discharge Prevention and Contingency Plan \(ODPCP\)](#) and U.S. EPA [Spill Prevention Control and Countermeasures \(SPCC\)](#) plan are managed in separate plans and procedures). The comprehensive list of oil containers regulated by the State and Federal rules and managed as described in the spill prevention plans is best represented by the list in Appendix A of the SPCC Plan. **Figure 1: Summarization of the SPCC verses Drain to Contain Spheres of Container Management** further illustrates the division between SPCC regulation and portable containers and secondary containment that fall under the **Drain to Contain** management program.

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<sup>1</sup> Oil of any kind and in any form, whether crude, refined, or a petroleum by-product, including but not limited to petroleum, fuel oil, gasoline, lubricating oils, oily sludge, oil refuse, oil mixed with other wastes, crude oils, liquefied natural gas, propane, butane, or other liquid hydrocarbons regardless of specific gravity.

**Figure 1: Summarization of the SPCC verses *Drain to Contain* Spheres of Container Management**

<b>SPCC Container Mgmt.</b>	<b>Oil</b>	<b>Non-Oil</b>		<b><i>Drain to Contain Mgmt.</i></b>	<b>Oil</b>	<b>Non-Oil</b>
<b>≥ 55 gal</b>	Oil ≥ 55 gal	Non-Oil ≥ 55 gal	<b>Outdoor Portable Containers</b>	<b>≥ 55 gal</b>	Oil ≥ 55 gal	Non-Oil ≥ 55 gal
<b>&lt; 55 gal</b>	Oil < 55 gal	Non-Oil < 55 gal		<b>&lt; 55 gal</b>	Oil < 55 gal	Non-Oil < 55 gal

This SOP does **not** include Hazardous Waste Satellite Accumulation Areas (SAA's), or Universal Waste Accumulation Areas (UWAA) which fall under Resource Conservation and Recovery Act (RCRA) regulations. If doubt exists as to the regulatory program governing any substance, consult the Waste Information System (WIS) or contact your Supervisor for clarification.

The ADEC Waste Management Permit (WMP) requires secondary containment for all mill, water treatment, and RO Water Treatment Plant, tanks and reagents. The Mill manages reagents inside the mill building with concrete secondary containments. Reagents containers and secondary containments are checked once a shift by mill operators using the *Red Dog Operations Reagents Work Place Examination Form*. RO Water Treatment Plant manages reagents inside connex with secondary containment in place. These are inspected and maintained on a periodic basis using the *RO-WTP Winter Checklist*. These portable containers and secondary containment do **not** fall under this SOP.

Material Management transports and stores reagents and other chemicals according to federal *Hazardous Material Transportation* regulations (40 CFR 171-173) and Red Dog Mine's ADEC Waste Management Permit. Materials Management may stage or store portable containers and secondary containment temporarily at many locations around site while managing materials, however, these also do **not** fall under this SOP. Examples of these activities include:

- Transport from plane or barge ,
- MatMan storage areas/laydown yards,
- TVP transport from Warehouse or Cold Storage.

## 1.2 Portable Containers and Secondary Containment Included

The *Drain to Contain* program is applicable to secondary containments used to store chemical products outdoors while in the process of being utilized, or non-hazardous waste products collected for disposal that are not already being managed under another regulatory program. This SOP is intended to help prevent poor housekeeping by supporting a more formal approach to stormwater pollution protection that also incorporates Teck's internal spill prevention best management practices.

A small group of portable containers stored outdoors falls under this ***Drain to Contain SOP***, including:

- Outdoor oil containers of less than 55-gallons capacity (i.e. those oil containers which are not managed under the ODPCCP or SPCC programs).  
Examples:
  - 2.5 & 5-gallon gasoline containers
  - 20-gallon drum of grease
- Outdoor containers of holding non-oil chemical products, liquids or solids.  
Examples:
  - Glycol totes with product in use
  - Glycol storage ISO tanks
  - Airport de-icing solution
  - 5-gallon buckets of water-based paint
  - Antiscalant tank
  - Other reagents stored outdoors while in use (not just temporarily staged for delivery)
  - Exploration rock saw waste water totes
  - Used glycol storage drums or totes
  - *Note: This list does **not** includes open, or covered dumpsters.*

For more information about what substances fall under the ***Drain to Contain*** program please see **Figure 4: Summary of Regulatory Oversight for Portable Containers and Secondary Containment** in Section 3.6. The primary departments/groups that use and/or manage portable containers include Mine, Mill, Maintenance, the HE Shop, Tailings & Environment, Materials Management, Exploration, Projects and the Port. The objective of this SOP is to ensure that ALL containers that fall under the ***Drain to Contain*** program are properly labeled, stored on appropriate secondary containment, and are regularly inspected and maintained.

The Environmental Department offers support through training and consultation to help ensure Departments responsible for managing portable containers and secondary containment have the information they need to stay in compliance.

### 1.3 Permanent versus Temporary Secondary Containment (for Portable Containers)

The requirements for permanent secondary containments (6 months or longer of intended use) are described in Sections 3.1 through 3.1.2 of this SOP.

- Section 3.1 – Permanent ***Drain to Contain*** Secondary Containment Inventory
- Section 3.1.1 – Add a New Chemical to a Permanent ***Drain to Contain*** Secondary Containment
- Section 3.1.2 - Decommission a Permanent ***Drain to Contain*** Secondary Containment.

Section 3.2 to 3.8 apply to both permanent and temporary secondary containments (less than 6 months of intended use).

- Section 3.2 Ownership Areas
- Section 3.3 Portable Containers & Secondary Containment Risk Matrix
- Section 3.4 Hierarchy of Secondary Containment Options
- Section 3.5 Labeling
- Section 3.6 Summary of Regulatory Oversight
- Section 3.7 Inspections
- Section 3.8 Contractors *Drain to Contain* Requirements

## 2 Health and Safety

The appropriate procedure for handling portable containers depends on their contents. Thus, prior to any handling, containers should be visually inspected to gain as much information as possible about their contents. Portable containers frequently contain petroleum products that are flammable, or hazardous chemicals that could be toxic. Obtain and understand the applicable Safety Data Sheet (SDS) for any container before handling it. Red Dog SDS can be found on Rover/Applications/[SDS Web Services](#). SDS may also be found online at the manufacturer's website.

## 3 Procedure

The first goal of this procedure is to identify all existing permanent secondary containment areas that fall under the *Drain to Contain* program, and to facilitate a review of the secondary containment's management by the Department that is responsible for it. This will help ensure that the necessary inspections and maintenance are performed and documented to maintain compliance. This may also include a review by the E&I Department if any on the portable containers include combustible or flammable substances. The E&I Department will ensure proper bonding of the containers to the secondary containment grid, and grounding of the secondary containment. Once a containment area has been through this process, any addition of new chemicals to be stored on the secondary containment will trigger another Department Supervisor review to ensure compliance is maintained.

The second goal is to reduce the number of secondary containment areas to the smallest number feasible as well as to reduce the number of secondary containments outdoors and exposed to stormwater.

The third goal is to facilitate proper labeling, maintenance, inspections, and documentation to demonstrate compliance. All portable containers and any associated secondary containment shall meet Teck's best management guidelines for spill prevention and comply with SWPPP pollution prevention requirements.

### 3.1 Permanent *Drain to Contain* Secondary Containment Inventory

A complete onsite inventory of permanent, *Drain to Contain* secondary containments shall be created in 2022 and maintained on the Rover/Departments/Environmental/*Drain to Contain Secondary Containment Inventory* web page. Environmental will facilitate the creation of the

website and provide consultation for questions or issues that arise while the inventory is being created. Each department is responsible for identifying permanent (more than 6 months of intended use), outdoor, storage areas for portable containers and associated secondary containment, within their areas of responsibility. Once identified, they are entered into the ***Drain to Contain Secondary Containment Inventory*** using the ***New Secondary Containment Inventory Form*** that is part of the FastFields library. The information listed below is required to add a secondary containment into the inventory.

- Department responsible for secondary containment.
- Date secondary containment was commissioned.
- Description of location of secondary containment.
  - Latitude/Longitude coordinates (if available).
- Description of secondary containment type including liners, roofing structures etc.
- Size of secondary containment.
- Size(s) of container(s) stored on the secondary containment.
- Contents of portable containers.
- SDS of substance(s) stored in the portable containers.
- Description of procedures to both remove clean rain/snowmelt water and remove & dispose of contaminated rain/snowmelt water from secondary containment (if applicable).
- Description of spill cleanup procedures for stored substances.

Secondary containment areas will receive a unique identification number when entered into the inventory. An example of this ID number would be: **"HEShop 2016-003"** giving the department responsible, year the containment area was put into service, as well as a unique number designation. This secondary containment identification number will be recorded as the location ID on all the labels of the portable containers stored on that particular secondary containment (refer to section 3.5 Labeling).

Environmental will periodically audit the inventory for compliance with waste disposal and spill clean-up procedures. Annual review of the ***Drain to Contain Secondary Containment Inventory*** will indicate progress towards reducing use of outdoor secondary containments as part of annual EMS continuous improvement goals.

### **3.1.1 Adding New Chemicals/Products to a Permanent *Drain to Contain* Secondary Containment**

If at a later date, new products, chemicals, or a non-hazardous waste, need to be added to a permanent secondary containment storage area, the additional new substance needs to be reviewed by the responsible Department Supervisor and the ***Drain to Contain Secondary Containment Inventory*** updated. New substances may require changes to the pumping and water disposal plans, as well as spill response measures, already in place for that particular secondary containment. New substances can be added via the monthly ***Drain to Contain Inspection Form*** listed in the FastFields library. The additional substances will be automatically uploaded into the inventory database and trigger a review by Environmental as well.

### 3.1.2 Decommissioning a Permanent *Drain to Contain* Secondary Containment

If at a later date a *Drain to Contain* secondary containment is permanently decommissioned, notify Environmental to update the *Drain to Contain Secondary Containment Inventory*. Once officially decommissioned, monthly inspections are no longer required.

### 3.2 Ownership Areas

Red Dog Operations ownership areas/boundaries (buildings and exterior areas surrounding the buildings) and their respective area-owner departments, are identified in the following Qualtrax documents:

- [Ownership Drawing – Sitewide \(Qualtrax #4906\)](#)
- [Ownership Drawing – Mill Areas \(Qualtrax #4908\)](#)
- [Ownership Drawing – Port Site \(Qualtrax #4909\)](#)

These ownership maps can assist in determining areas of responsibilities for all existing outdoor, secondary containments, temporary or permanent, that fall under the scope of this procedure. If a secondary containment structure falls outside the coverage of the ownership maps, consultation with Supervision is required.

### 3.3 Portable Containers & Secondary Containment Risk Matrix

*Drain to Contain* portable container outdoor storage may require different types of secondary containment, depending on the location of the storage area, and the substance being stored.

For instance, a very low risk activity, such as temporarily storing a couple of 5-gallon gas cans and some chainsaw oil (at least 100 feet away from any surface water), may only require a duck pond, more as a general good housekeeping procedure rather than actual spill containment.

An example of a high risk activity is storing a 300-gallon tote of glycol in close proximity to the Bons Creek Reservoir or Red Dog Creek, this would require a lined connex or a spill containment barge with 110% containment.

The **Risk Matrix for Portable Containers** in **Table 1** provides guidance as to the type and size of any secondary containment that may be required to manage risk associated with the substances being stored. If unsure of secondary containment requirements, consult Environmental for guidance with any medium to high risk activities when establishing a temporary or permanent secondary containment.



**Table 1 - Risk Matrix for Portable Containers**

	Largest Individual Portable Container < 55 Gallons	Largest Individual Portable Container ≥ 55 Gallons	Any Container Outside TSF Drainage	Any Container Near Surface Water
Oil	Low	Within the scope of the SPCC/ODPCP		
Glycols	Low	Medium	Medium	High
Nonhazardous Substances Solids	Low	Medium	Medium	High
Nonhazardous Substances Liquids	Low	Medium	Medium	High
Hazardous Substances Solids	Medium	Medium	Medium	High
Hazardous Substances Liquid	Medium	High	High	High

*\*Hazardous and Non-Hazardous as defined by CFR 49 Part 171.8 DOT Hazardous Material Definitions*

### 3.4 Hierarchy of Secondary Containment Options

Secondary containment options follow a preferred hierarchy for both temporary and permanent secondary containments. (See **Table 2 - Hierarchy of Secondary Containment Options**).

Option 1, indoor storage of chemicals, should always be used if available. Option 6, outdoor, uncovered storage, should only be used when no other options are feasible.

**Table 2 – Hierarchy of Secondary Containment Options**

<b>Option 1</b>	Indoor storage of any liquid or solid chemical where spills are contained and the substance and has increased protection from exposure to precipitation or the environment.
<b>Option 2</b>	Use shipping containers, with liners, as secondary containment and protection from exposure to precipitation or the environment.
<b>Option 3</b>	Outdoor double-walled storage in tanks with built-in secondary containment.
<b>Option 4</b>	Outdoor storage under a roofed structure or in an unlined shipping container.
<b>Option 5</b>	Outdoor storage in a self-contained and covered spill pallet.
<b>Option 6</b>	Outdoor storage on an uncovered spill pallet.

Option six is the most labor intensive form of portable container management requiring monthly inspections and periodic cleaning/pumping of the secondary containment. It also has the highest risk of non-compliance with the SWPPP, and increased incidents of negative audit findings. Option six should only be used if none of the previous options are feasible.

### 3.5 Labeling

Proper labeling of all containers, on both temporary and permanent secondary containments, is required. If containers are not properly labeled, regulatory personnel and auditors typically regard such a containers as a 'negative finding' and possibly a compliance violation.

#### 3.5.1 New / Useable Product Labeling

New product containers are labeled by the manufacturer when brought to site. If the original label is missing or not otherwise legible, replace with the manufacturer's label if possible. If not available, then replace the label with s/c 58641 and fill it out legibly. As this is not a waste, and simply a product being relabeled, write "Not a Waste" in the bottom right hand corner (see **Figure 2: Example of a Non-Hazardous Waste Label at a Permanent *Drain to Contain* Secondary Containment** below).

**Figure 2: Example of a Replacement Product Label at a Permanent *Drain to Contain* Secondary Containment (s/c 58641)**

<b>SAA/OUO/UW ID:</b> PWRH 2016-3	<b>W/H Container ID:</b>
<b>Date First Waste in Container:</b> N/A	<b>Date Received at Warehouse/CAA:</b>
<b>Contents:</b> Antiscalant	<b>Weight (lbs):</b>
<b>Process Generating Waste:</b> N/A	<b>Not a Waste</b>
<b>Department/Location:</b> Mill Maintenance	
<b>Supervisor:</b> Rob Corley	
<b>Date Container Filled:</b> N/A (55 gallons maximum)	
<b>S/C 58641</b>	
<b>RD-171-02</b>	<b>AFFIX LABEL HERE</b> Hazardous Waste s/c 136954 Non-Hazardous Waste s/c 136955 Hazardous Waste Pending s/c 137017 Universal Waste s/c 135835 Used Oil s/c 65610



### 3.5.2 Non-Hazardous Waste Labeling

If a non-hazardous, waste is being stored on a secondary containment, such as used glycol, the Waste Identification Label (s/c 58641) is used.

- If the waste is on a temporary secondary containment, the SAA/OUO/UW ID can be written as “Not Applicable”
- On a permanent secondary containment the upper left “SAA/OUO ID:” is used for the Secondary Containment ID Number assigned to a permanent secondary containment in the *Drain to Contain Secondary Containment Inventory*. An example of this ID number would be: “**BFM 2016-003**”.

Any non-hazardous waste also requires the green Non-Hazardous Waste Label (s/c 136955) as part of the container label (see **Figure 3: Example of a Non-Hazardous Waste Label at a Permanent Drain to Contain Secondary Containment** below).

**Figure 3: Example of a Non-Hazardous Waste Label at a Permanent Drain to Contain Secondary Containment (s/c 58641)**

<b>SAA/OUO/UW ID:</b> BFM 2016-3 <b>Date First Waste in Container:</b> 2/2/2021  <b>Contents:</b> Used Glycol  <b>Process Generating Waste:</b> Boiler Maintenance  <b>Department/Location:</b> Mill Maintenance  <b>Supervisor:</b> Josh Skeeters  <b>Date Container Filled:</b> (55 gallons maximum)  <div style="text-align: right;"><b>S/C 58641</b></div> <div style="text-align: left;"><small>RD-171-02</small></div>	<b>W/H Container ID:</b> <b>Date Received at Warehouse/CAA:</b>  <b>Weight (lbs):</b>  <div style="border: 2px solid green; padding: 10px; text-align: center;"> <p><b>NON-HAZARDOUS WASTE</b></p> <p><b>Do Not Dispose Without Approval from Environmental Dept.</b></p> <div style="display: flex; justify-content: space-between; font-size: small;"> <span>RD-174-02</span> <span>S/C 136955</span> </div> </div> <div style="text-align: center;"><b>S/C 136955</b></div>
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### 3.5.3 Best Management Practice for Container Labeling

When labeling containers, for either indoor or outdoor storage, cover the affixed label with clear packing tape whenever possible. This helps ensure the label stays attached and helps protect it from the elements and maintains legibility.

Use *Waste Management Guidelines* from the [WIS](#) for correct labeling information (see Section 8 Key Documents/Tools/References).

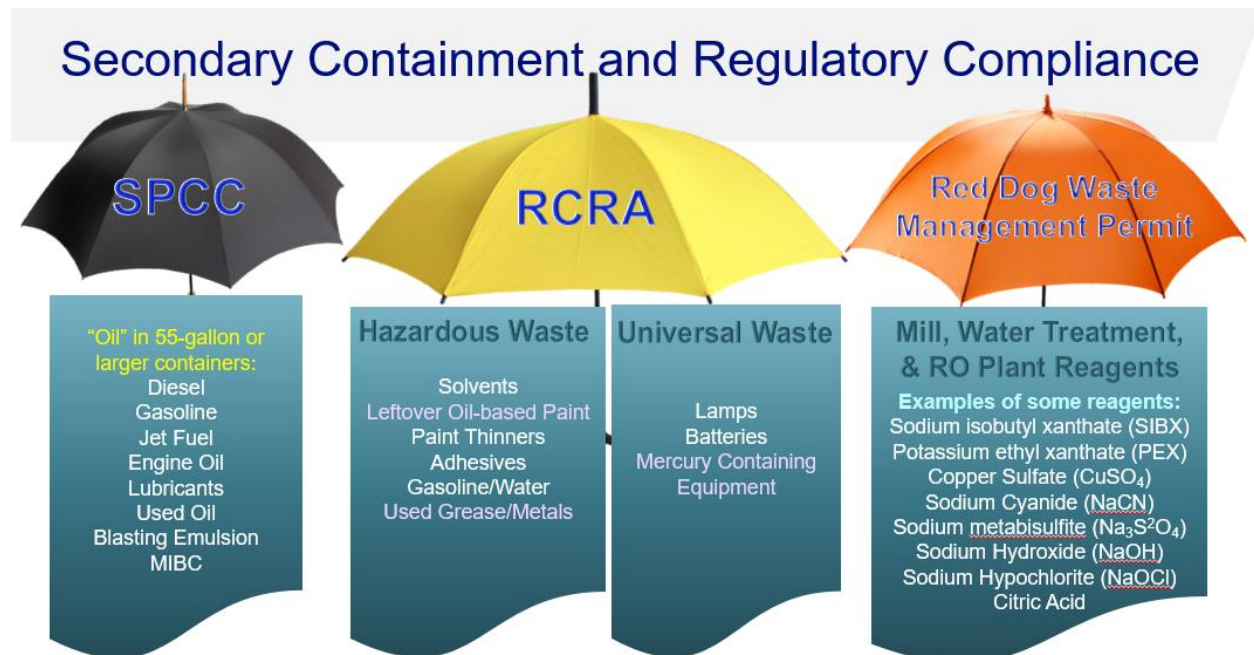
### 3.6 Summary of Regulatory Oversight

Secondary containments that are managed under the SPCC Plan are inspected monthly as documented using FastField SPCC inspection forms.

**Please Note:** Oil containers of **55-gallons or greater, cannot be stored on a *Drain to Contain* secondary containment, even if just staged temporarily. If SPCC-regulated containers are stored on a *Drain to Contain* secondary containment, it is a non-compliance.**

Hazardous Waste and Universal Waste containers are also **not** permitted to be stored on *Drain to Contain* Secondary Containment (see **Figure 4: Summary of Regulatory Oversight of Portable Containers and Secondary Containment**). Check the WIS to determine if the waste in question is classified as Hazardous Waste or Universal Waste. If doubt exists as to the regulatory program governing any substance container and correct classification of any secondary containment, contact Environmental Department for clarification.

**Figure 4: Summary of Regulatory Oversight for Portable Containers and Secondary Containment.**



## Secondary Containment and Regulatory Compliance



### 3.7 Inspections

#### 3.7.1 Inspection Forms

All **Drain to Contain** secondary containment areas shall be inspected and documented monthly. Permanent secondary containments (included in the Drain to Contain Inventory) will use the FastFields *Drain to Contain Inspection Form* and all temporary secondary containments will be inspected using the responsible Department's monthly *Hazard Recognition Audit*.

##### 3.7.1.1 Permanent Secondary Containments - **Drain to Contain Inspection Form**

If a department manages a permanent **Drain to Contain** secondary containment, the FastField form *Drain to Contain Inspection Form* requires the following information.

- Name, location and ID number of the secondary containment.
- Whether each portable container on secondary containment is correctly and legibly labeled.
- Assure no oil containers of 55-gallon or greater are stored on the **Drain to Contain** secondary containment and document what substances are present on the secondary containment.
- Whether each secondary containment is free of spills or other contamination.
- Whether each secondary containment is clean and free of collected water and snow.

- If water or snow are present, either clean or contaminated, date of pumping/cleaning and location of disposal, needs to be recorded.

*Note:* Proper disposal procedures are established when a permanent secondary containment is entered into the ***Drain to Contain Secondary Containment Inventory***. These procedures are established in consultation with Environmental if needed. See Section 3.1 above.

### 3.7.1.2 Temporary Secondary Containments – Hazard Recognition Audits

If the department owns temporary secondary containments, the same inspection procedure is required. A section shall be added to the Department's *Hazard Recognition Audit* (in FastFields) with the same questions (except the secondary containment ID number) required for each temporary secondary containment in use.

### 3.7.2 Record Keeping and Auditing

The ***Drain to Contain Secondary Containment Inventory*** will be maintained on the Rover/Departments/Environmental web page. Links to monthly inspection forms for every Department responsible for permanent or temporary secondary containments will allow easy access to all completed inspections. A tracking table displaying completed secondary containment inspections, will indicate the current status of each secondary containments via a Power Bi Report.

Environmental will audit the ***Drain to Contain Secondary Containment Inventory*** and the monthly inspections on a quarterly basis during 2022 and periodically thereafter to confirm compliance.

### 3.8 Contractor ***Drain to Contain*** Requirements

Any Department employing contractors must submit descriptions of temporary storage of portable containers on secondary containment, prior to the start of any project, through the [Contractors Environmental Requirements Program \(Qualtrax #6203\)](#). It includes questions about possible secondary containments needs and allows Environmental to advise and facilitate in the compliant use of portable containers and secondary containment.

### 3.9 Training Requirements

All employees who handle or manage ***Drain to Contain*** portable storage containers and secondary containments and/or perform monthly *Hazard Recognition Audits* that could include secondary containments should review this SOP every two years in conjunction with the ***Drain to Contain Training Module***. Supervisors will identify roles, or individuals who may perform secondary containment inspections, and they will be assigned the ***Drain to Contain Training Module*** as a required training in SiteLine by Environmental. The ***Drain to Contain Training Module*** is in video format and a hardcopy quiz to accompany the presentation. A review of the quiz will be included during the last section of the video. The presentation can be played for groups during safety meetings or watched individually. The presentation will be linked in SiteLine to the training requirement for easy access, and available on the Rover/Departments/Environmental Training website.

## 4 Key Responsibilities

Department Superintendents - Responsible for portable containers and associated secondary containment in their ownership area. Participation in the original creation of the permanent

***Drain to Contain Secondary Containment Inventory.*** Ensure monthly inspections of both temporary and permanent secondary containments are performed.

Project Managers – Ensure Contractors are aware of and comply with the requirements in this SOP.

Environmental Coordinators – Facilitate the creation of the ***Drain to Contain Secondary Containment Inventory*** website. Advise other Departments on containment size, spill response, waste water disposal methods etc. as needed. Periodically audit inventory and field inspections to ensure compliance. Provide and update the ***Drain to Contain Training Module*** and assign training to personnel who require it in SiteLine.

## **5 Departure from Procedure**

This SOP was written to comply with applicable laws and regulations pertaining to portable containers and secondary containment management. Failure to follow this procedure could result in negative impacts to health and safety of personnel and the environment. Departure from procedures resulting in pollution may also lead to criminal or civil penalties for responsible individuals, as well as have adverse effects on corporate performance and the reputation of Teck Alaska.

## **6 Definitions**

ADEC: Alaska Department of Environmental Conservation

APDES: Alaska Pollutant Discharge Elimination System

BMP: Best Management Practices

EMS: Environmental Management System

Oil: Oil of any kind or in any form, including, but not limited to: fats, oils, or greases of animal, fish, or marine mammal origin; vegetable oils, including oils from seeds, nuts, fruits, or kernels; and, other oils and greases, including petroleum, fuel oil, sludge, synthetic oils, mineral oils, oil refuse, or oil mixed with wastes other than dredged spoil.

Ownership Area: Mine Department, Mill Department, Maintenance Department, Tailings and Water Department, Project Department, and Materials Management Department and the Port. Maps of ownership area boundaries can be found in Qualtrax (document numbers listed above in Section 3.2).

ODPCP: Oil Discharge Prevention and Contingency

Portable Container: Drums, totes, ISO-tanks, and other non-fixed, non-mobile/non-wheeled containers of 55 U.S. gallons or greater capacity.

PPP: Pollution Prevention Plan

RCRA: Resource Conservation & Recover Act

SAA: Satellite Accumulation Area (Hazardous Waste)



SDS: Safety Data Sheet

SPCC: Spill Prevention, Control & Countermeasures

SWPPP: Red Dog Mine Pollution Prevention Plan for Storm Water Management

UWAA: Universal Waste Accumulation Area

WIS: Waste Information System

WMP: Waste Management Plan

## 7 General Requirements

- SPCC 40 CFR Part 112
- State regulations 18 AAC 75
- State regulations 18 AAC 83
- APDES Permit AK0038652

## 8 Key Documents/Tools/References

- [Red Dog Mine Pollution Prevention Plan for Storm Water Management, Qualtrax #660](#)
- [Red Dog Port Best Management Practices Plan \(BMP\), Qualtrax #1548](#)
- [SDS Web Services.](#)
- [Ownership Drawing – Sitewide \(Qualtrax #4906\)](#)
- [Ownership Drawing – Mill Areas \(Qualtrax #4908\)](#)
- [Ownership Drawing – Port Site \(Qualtrax #4909\)](#)
- [Contractors Environmental Requirements Program \(Qualtrax #6203\)](#)
- [Management of Petroleum and Glycol Drums and Containers SOP, Qualtrax #168](#)
- [Procedures for Handling 55 Gallon Drums, Qualtrax #2610](#)
- [Waste Management Guideline: Empty Drums – Mine, Qualtrax #600](#)
- [Waste Management Guideline: Empty Drums – Port, Qualtrax #661](#)
- [Handling of Unidentified Drums and Materials SOP, Qualtrax #1564](#)
- [Waste Management Guideline: Reusing Containers, Qualtrax #601](#)
- [Waste Management Guideline: Waste Containers and Labels, Qualtrax #508](#)
- [Waste Management Guideline: Used Oil, Shipped Offsite, Qualtrax #496](#)
- [Central Accumulation Area \(CAA\) Management SOP, Qualtrax #445](#)
- [Secondary Containment Pumping SOP, Qualtrax #179](#)



**9 Records**

Record	Location	Document Manager
<i>Drain to Contain Secondary Containment Inventory</i>	Rover/Departments/Environmental web page	Environmental
<i>Drain to Contain Secondary Inspection Form</i>	FastFields Library	Individual Departments
<i>Secondary Containment Drain/Pumping Log</i>	FastFields Library	Individual Departments
<i>Hazard Recognition Audits</i>	SharePoint/FastFields Files	Individual Departments