

REPORTING SPILLS ON NANA LANDS

Purpose and Scope

This document describes the reporting procedures for properly notifying NANA Regional Corporation (NANA) when a spill occurs on NANA Lands. These procedures apply to entities, contractors, Local Managers (gravel pits), private citizens, and all others working on or using NANA Lands. Any person or entity involved in, or with knowledge of, a spill that has occurred on NANA Lands is responsible to first notify the appropriate governmental agency(ies) as required by federal, state, or local law followed by notification to NANA.

Reporting Requirements to NANA

The following reporting requirements are applicable only to spill notifications to NANA, the Landowner. Under NANA's Land Management Policy, any person or entity working on or using NANA Lands must provide a spill notice report to NANA. Such a person or entity violates NANA's Land Management Policy if a spill is not reported to NANA per the following procedures:

Initial Telephone Report to NANA

24-hour spill reporting hotline

Call (907) 265-3749

- The initial phone call must report the following information:
- Your name
- Your company's name (if applicable)
- Your contact number
- Description of the spill – the substance if known (toxic and/or hazardous substance(s), oil), the quantity (estimated gallons), the source and cause of the spill if known, and the date and estimated time
- Impact of the spill – higher – severity (i.e. spill to water, injured person, injured wildlife) or lower – severity (for example: spill did not reach water, and no people nor wildlife have been injured)
- Location of the Spill – the name of the community, a description of the location (for example, "from the Volvo Dozer where the road meets the pit"). Include GPS coordinates, if possible.
- Current status of the spill: Has clean-up begun, is clean-up ongoing, or is clean-up finished?

TYPES OF REPORTING FOR POTENTIALLY RESPONSIBLE PARTIES

Any individual, including private citizen, business entity and its employees, and government representative(s) who perform an activity that results in a spill, injured person, or injured wildlife may become a responsible party under federal and/or state regulatory law. The potentially responsible party could be required by a governmental agency(ies) to contain or perform a cleanup of the reported spill. A potentially responsible party is to inform NANA of the severity of a spill and the potential for regulatory action on NANA Lands. A potentially responsible party must report to NANA as follows:

Higher – severity spill reports

The following are considered higher – severity spill incidents that require: 1) an initial phone report within 24-hours of the spill; **and**, 2) a follow-up written report to NANA within five (5) business days of the initial report.

- Spills of petroleum products and glycol greater than 10-gallons
- Spills of other chemicals (**not** petroleum or glycol) in any amount
- Spills of any chemical, including petroleum and glycol, in any amount to water
- Any incident in which *people* were injured
- Any incident in which *wildlife* was injured.

The follow-up written report to NANA could be a copy of any agency-required written report on the incident and its status. Include photo-documentation, if available. No further report will be required if, and only if, the incident has been completely resolved: all spill cleanup is complete (including all waste removed from NANA lands), and any applicable agency(ies) have released the responsible party from further action. Otherwise, the responsible party must provide monthly status reports to NANA until the cleanup is complete and any applicable agencies have released the responsible party from further action.

Lower – severity reports

The following are considered lower – severity spill incidents that require only an initial phone report to NANA within three (3) business days of the spill:

- For spills of *petroleum products* (oil, fuel, lubricants, etc.) and *glycol* less than 10-gallons **AND**
- The spill did not reach *water* **AND**
- If no *people* got hurt **AND**
- no *wildlife* was injured.

COMMUNITY INFORMATION

Even if there is no requirement by regulation or law, NANA encourages anyone who is responsible for, or has knowledge of, a spill on NANA Lands to inform local entities, such as the local City government, the local IRA, and the Village Safety Officer (VSO) or Village Public Safety Office (VPSO)