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May 2000

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

CAPE NEWENHAM LONG RANGE RADAR SITE

Upper Camp (SS07) and Drum Disposal Site (LF03)

Proposed Plan for Cleanup

INTRODUCTION

This **proposed plan** presents the cleanup alternatives proposed by the United States Air Force (Air Force) and the **Alaska Department of Environmental Conservation (ADEC)** for the Cape Newenham Long Range Radar Site (LRRS), Alaska. The sites covered in this proposed plan include the Upper Camp (SS07) and the Drum Disposal Site (LF03) at Cape Newenham LRRS.

This proposed plan includes a description of the sites; a historical overview of the sites; a summary of previous investigations and cleanup actions, including a summary of contaminants present; and a description of the risk due to the contaminants. This plan also identifies cleanup alternatives for contaminated areas and presents the Air Force and ADEC's preferred cleanup alternative. Other reports that address these sites include the *Remedial Investigation of PCBs at Upper Camp (SS07), Cape Newenham LRRS, Alaska* (Air Force, 1996a), the 1996 through 1998 Long-Term Monitoring Letter Reports (Corps of Engineers/Air Force, 1996, 1997, 1999), the *Draft Technical Report for PCB Cap Monitoring & Maintenance at Cape Newenham LRRS* (Air Force, 1999a), and the *Drum Removal (LF03) at Cape Newenham LRRS, Alaska* (Air Force, 1999b). These reports can be found at the information repository located at Elmendorf Air Force Base. Another information repository will be available in Platinum, Alaska.

The Air Force, under the **Installation Restoration Program (IRP)**, conducted several investigations at Cape Newenham LRRS to identify and fully evaluate suspected problems associated with past hazardous waste practices. The IRP parallels the **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)** guidelines in arriving at decisions for final site cleanup. The Air Force has conducted all investigations and cleanups in accordance with CERCLA, 42USC 9604(a); Executive Order 12580, Section 2(d), 52F.R. 2923, 23 Jan 87; and State of Alaska regulations 18 Alaska Administrative Code (AAC) 75, Article 3 "Discharge Reporting, Cleanup, and Disposal of Oil and Other Hazardous Substances."

HOW YOU CAN PARTICIPATE

You are invited to comment on the information and proposed cleanup actions discussed in this plan. Your comments will help with the choice of cleanup approaches for SS07 and LF03 that are technically sound and address your concerns. All public comments will be reviewed and considered before making a final decision. Public comments or additional data may result in a better solution. See the "How You Can Participate" box on the last page of this report for further information on how to comment on this plan.

Proposed Plan — A document prepared to inform the public about cleanup alternatives for contaminated sites and the preferred cleanup alternative.

Alaska Department of Environmental Conservation (ADEC) — An Alaskan government agency responsible for environmental regulations and enforcement.

Installation Restoration Program (IRP) — This Department of Defense environmental program ensures cleanup of contaminated federal facilities that pose threats to human health and the environment.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) — This federal law is concerned with uncontrolled hazardous substance releases that are priorities for cleanup evaluation and response.

PHYSICAL DESCRIPTION

Cape Newenham is a small coastal peninsula 460 miles southwest of Anchorage. Cape Newenham LRRS is located on about 2,300 acres of property within the Togiak National Wildlife Refuge and is bordered by Bristol Bay to the south and Kuskokwim Bay to the north. The location is remote and accessible only by air or sea. The nearest community is Platinum (population about 55), which is about 30 miles north of the LRRS on Goodnews Bay. Figure 1 shows the location and vicinity of the site.

The LRRS is divided into two areas, the Upper Camp and the Lower Camp. SS07 encompasses all of the Upper Camp. The Upper Camp is on a mountaintop with an elevation of about 2,000 feet. The southern tip of the mountaintop consists of steep cliffs and rocky outcroppings. The north side of the Upper Camp consists of a 30° slope of loose rock debris for about one-fourth of a mile. The Upper Camp contains the radar facility and is connected to the Lower Camp by a road and tramway. The Lower Camp area includes the runway, living quarters, and other facilities. A composite building, built in 1980, replaced the old industrial and housing structures. LF03 is at the north end of the runway at the Lower Camp. Figure 2 shows the installation layout and the location of the investigation sites.

SITE HISTORY

Cape Newenham LRRS was one of the original aircraft control and warning sites. The Cape Newenham installation was constructed in the early 1950's and became operational in 1954.

Communications at Cape Newenham were originally provided by a high frequency radio system. A White Alice Communication System replaced the original radio system in 1957. This system was deactivated in 1979 and replaced with an Alascom-owned satellite earth terminal system.

Initially, the Cape Newenham installation provided living quarters for about 100 military personnel. In 1977, a contractor was hired to provide support services, eliminating many military positions. Installation of Joint Surveillance System equipment in 1982 enabled radar and beacon data to be transmitted directly via satellite to Elmendorf Air Force Base. This eliminated the remaining military positions and permitted total operation by the contractor. Today, about four people live at the site and reside at the Lower Camp in the composite building (Air Force, 1997).

The Upper Camp aircraft control and warning system was converted to a minimally attended radar station in 1984. The current military mission of the Cape Newenham LRRS is the continued operation of the minimally attended radar station as part of the SEEK IGLOO Program that performs aircraft control and warning missions in Alaska (Air Force, 1999c).

Upper Camp (SS07)

Polychlorinated biphenyls (PCBs) at the Upper Camp were historically used in transformers at the former electrical substation. PCBs were first detected in soil near the electrical substation in 1988. The mountainside area was reportedly used from the 1950s to the 1970s to dump debris related to Upper Camp activities including ethylene glycol (anti-freeze) and water drained from radar units, waste oil in containers, and scrap metal. Based on PCB contamination in the soil at the Upper Camp, the site was designated as IRP Site SS07. SS07 includes all of the Upper Camp.

Polychlorinated biphenyls (PCBs)
Suspected cancer causing compounds with various historical industrial applications (e.g., used in electrical transformers). PCBs do not readily migrate, nor do they readily degrade.

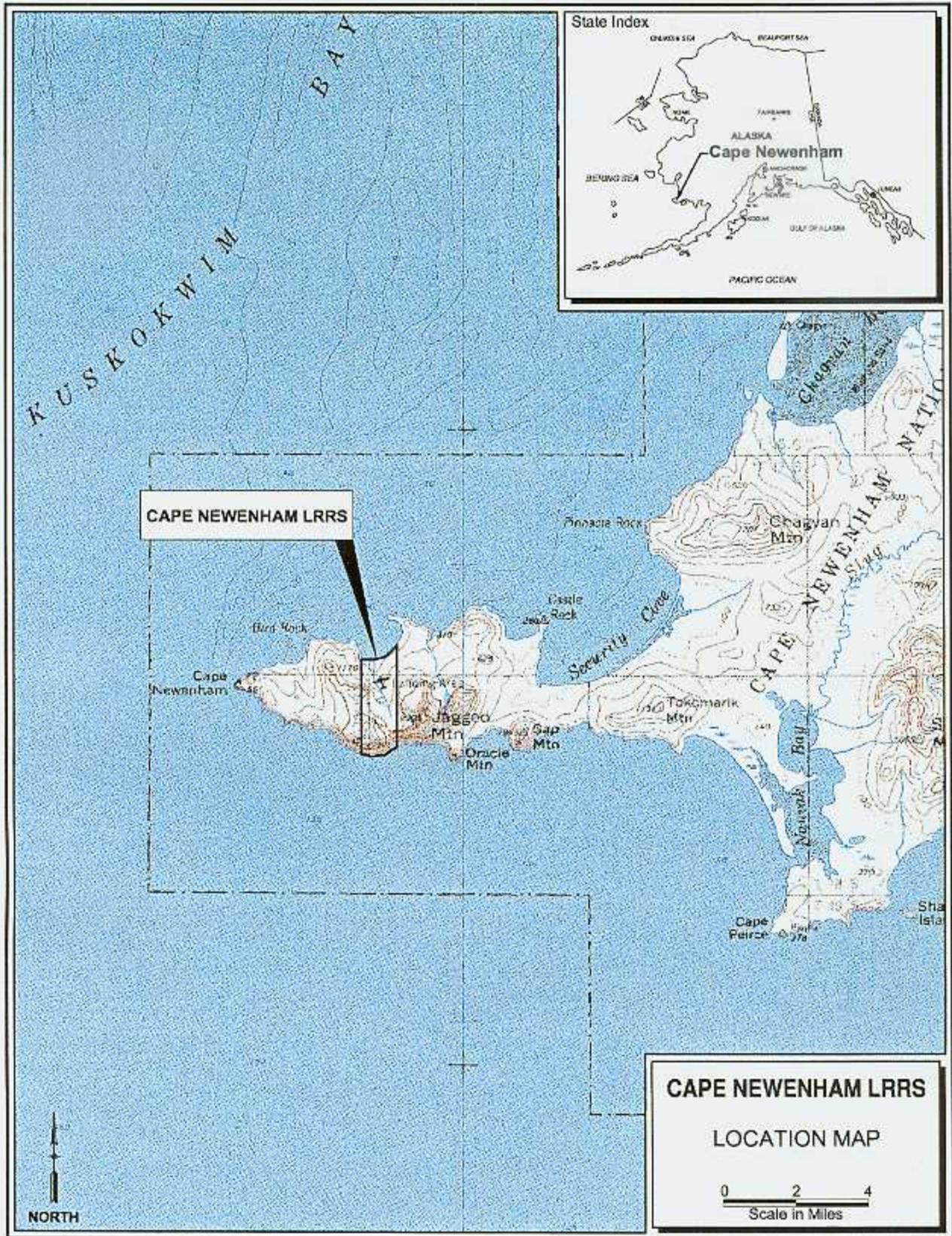


Figure 1. Location of Cape Newenham LRRS, Alaska

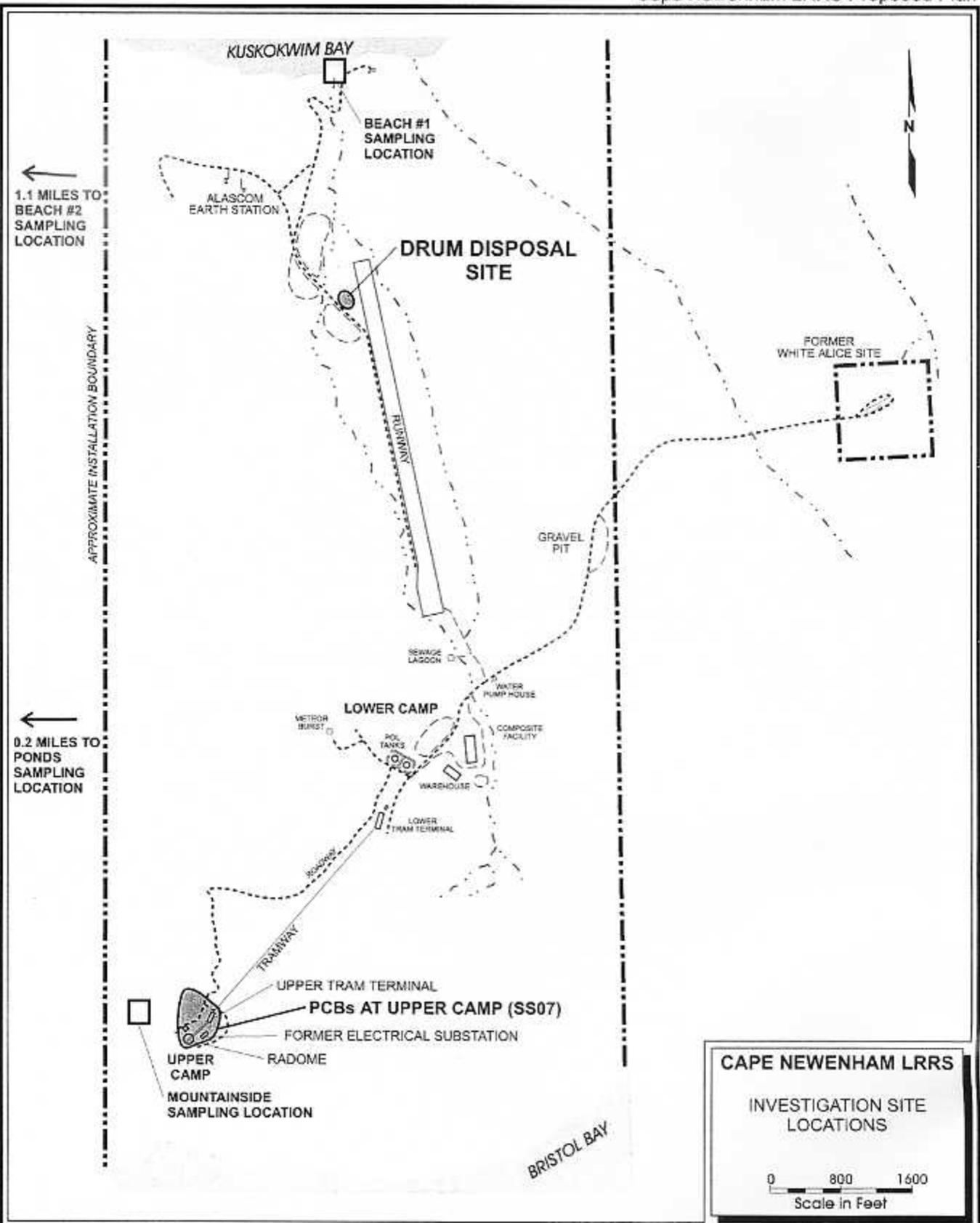


Figure 2. Location of Investigation Sites at Cape Newenham LRRS, Alaska

Drum Disposal (LF03)

The 2,400-square-foot Drum Disposal site is situated within a larger area previously identified as Waste Accumulation Area No. 2 located next to the runway. This site was used to store drums and debris from the 1950s to the 1970s. Sampling results indicated that all **chemicals of concern** were below regulatory criteria, and Waste Accumulation Area No. 2 was closed under the No Further Remedial Action Planned process.

Chemicals of Concern
— Chemicals detected at the site during previous sampling efforts whose levels exceed regulatory limits or risk-based levels.

In 1995, about 25 previously unreported drums were discovered at Waste Accumulation Area No. 2. Erosion at the site probably exposed this drum mound. As a result, this site was reopened in 1997 and renamed LF03.

Additional information on SS07 and LF03 can be obtained from the information repository located at Elmendorf Air Force Base. Another information repository will be available in Platinum, Alaska. The repository contains information about Cape Newenham LRRS including detailed investigation reports, evaluation of potential cleanup technologies, and results from field studies.

RESULTS OF PREVIOUS INVESTIGATIONS AND CLEANUP ACTION

This section summarizes previous investigations and remedial action conducted at SS07 and LF03. For more detail, refer to the individual reports available at the information repository.

Previous Investigations/Cleanup at Upper Camp (SS07)

The mountainside area of Upper Camp has been identified in many previous investigations. The following summaries provide an overall picture of the contamination at SS07.

USFWS Site Investigation, 1989

In 1988, the U.S. Fish and Wildlife Service (USFWS) sampled the soil at SS07. Sample results show that PCBs were present in the surface soil near the Electrical Substation at high levels [3,096 **parts per million (ppm)**]. USFWS recommended further evaluation of SS07.

Remedial Investigation/Feasibility Study to Support a Remedial Action Alternative, 1991

In 1990 a **remedial investigation/feasibility study** was conducted at SS07 based on the recommendations of the USFWS report. Soil sample results show that about 13 cubic yards of surface soil at SS07 had PCBs above regulatory cleanup levels. The study recommended that the soil with PCBs be removed and placed in an off-site landfill.

PCB Investigation Report, 1995

Soil sampling performed in 1994 showed that the extent of PCBs was greater than previously thought. The Air Force decided to do further investigation.

Remedial Investigation of PCBs at Upper Camp (SS07), 1996

Extensive soil sampling in 1995 showed that a 15,500-square-foot area had PCBs above 10 ppm. The main area of contamination is on the level areas of SS07, north of the radar dome. Other small areas with PCBs greater than 10 ppm were found on the steep slope (mountainside) northwest of the radar dome. The report recommended cleanup action for SS07. Figure 3 shows the mountainside area of the Upper Camp and Figure 4 shows the areas of SS07 with PCBs greater than 10 ppm.

Parts per Million (ppm) — Unit used to quantify a chemical of concern in soil.

Remedial Investigation — A field study conducted to determine the types, amounts, and locations of contamination at a site.

Feasibility Study — A study to identify all viable cleanup alternatives.

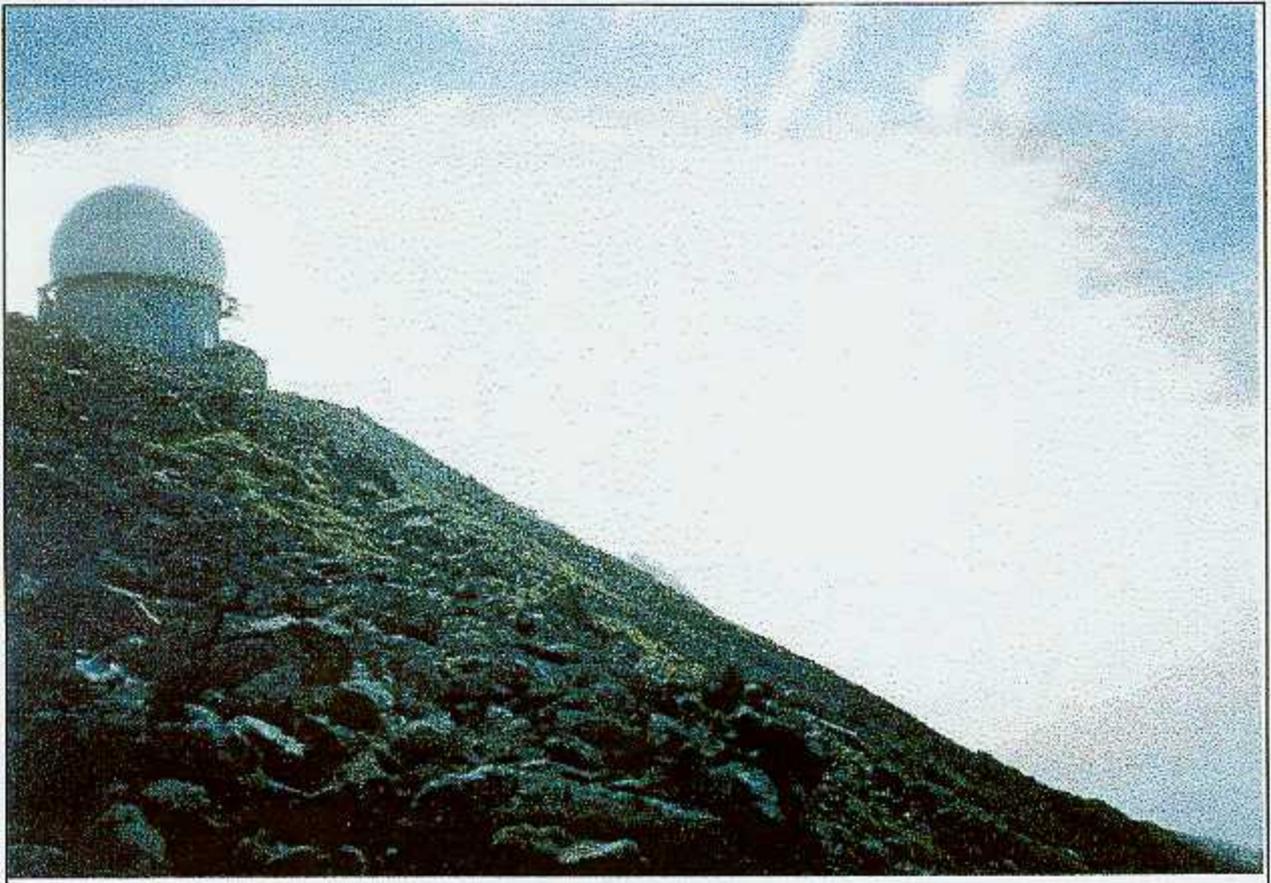


Figure 3. Mountainside Area of Upper Camp (SS07), Cape Newenham LRRS, Alaska

Remedial Action Report, PCB Cap Construction (SS07), 1996

In 1996, the Air Force capped the majority of the PCB-contaminated area at SS07. The mountainside area was not capped because heavy equipment cannot operate on a steep slope, and a cap would erode quickly (see Figure 3). The Air Force also demolished the PCB-contaminated electrical substation building and removed and replaced the radar tower piers. Further sampling showed the extent of PCB contamination in relation to the radar tower piers and footings. Low levels of PCBs were detected in surface soil from a single test pit. The test pits were refilled and covered by the cap (see Figure 4).

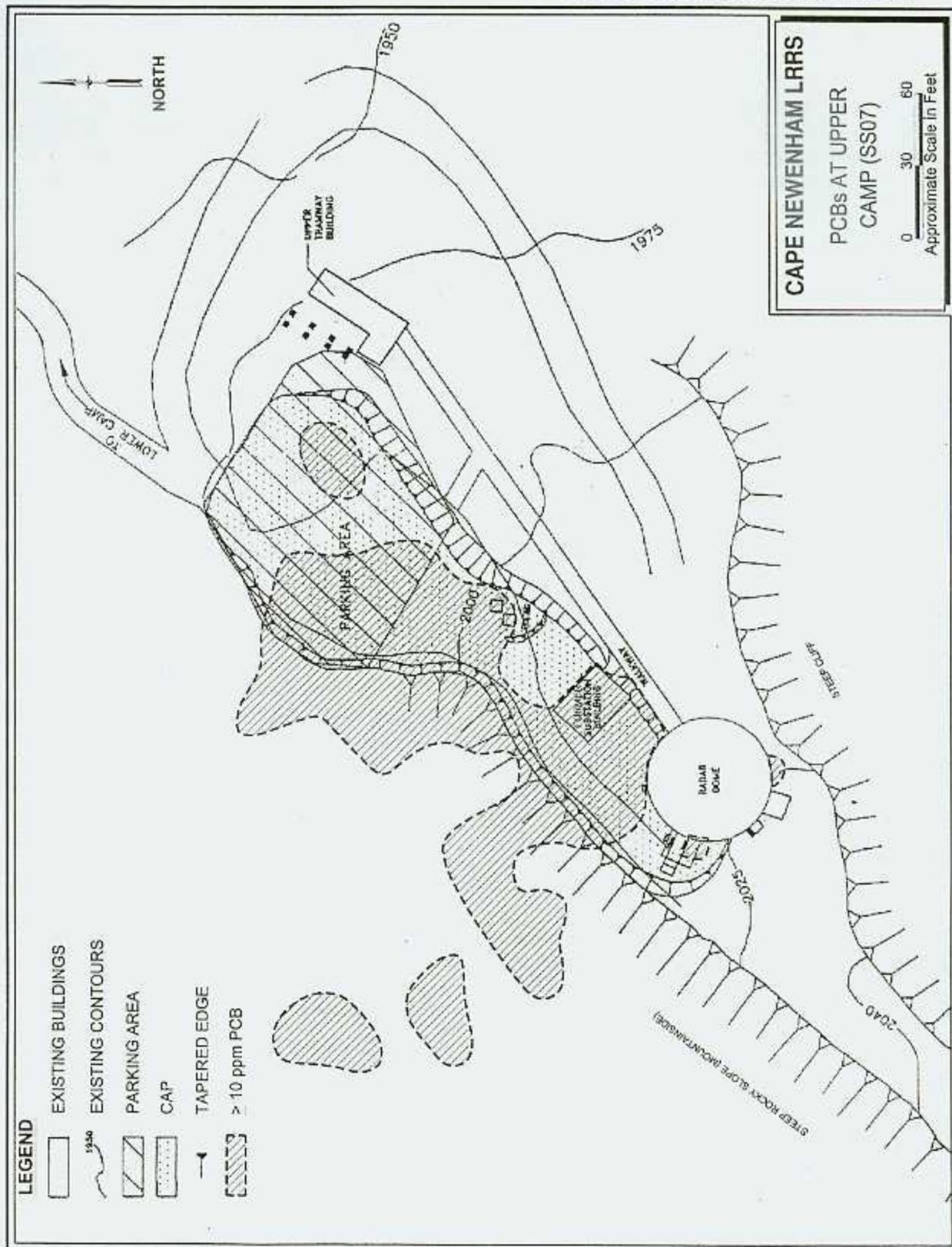


Figure 4. PCBs at Upper Camp (SS07). Cape Newenham LRRS, Alaska

Long-Term Monitoring 1996, 1997, 1998, and 1999

Long-term monitoring was conducted to evaluate whether, after placement of the cap, PCBs at SS07 were moving through the groundwater or surface water. Annual sampling was conducted in 1996, 1997, 1998, and 1999. Sampling areas included the mountainside north of SS07, a group of shallow ponds downhill and northwest of SS07, a beach area (Beach #1) near the north end of the runway, and a cove beach (Beach #2) in the northwest coast of the cape (see Figure 2). No PCBs were found at the ponds or at either beach. The 1997, 1998, and 1999 monitoring included soil samples collected from the mountainside to further characterize the PCB contamination in this area. The 1998 mountainside soil samples were collected downhill from the 1997 mountainside samples and had significantly lower PCB levels. The 1999 mountainside samples were collected at some 1997 and some 1998 locations. Table 1 shows the range of PCBs detected for each year.

Long-term Monitoring
— A series of sampling events conducted to evaluate contaminant migration, natural degradation, etc.

Table 1
Range of PCB Results (ppm)
1996-1999 Long-Term Monitoring
Cape Newenham LRRS, Alaska

Sample Location	1996 Results	1997 Results	1998 Results	1999 Results
Beach #1	ND	ND	ND	ND
Beach #2	ND	ND	ND	ND
Ponds	--	ND	ND	ND
Mountainside	--	1.5 - 4600	0.58 - 120	0.38 - 300

Note: Soil sampling on the mountainside was difficult because of the lack of soil. The samples were collected by scraping small amounts from around the rocks until there was enough to fill the sample jar. The sample results should only be considered to represent PCB concentration of the relatively small amount of soil found in the pockets around the rocks.

ND Not detected (less than 0.2 ppm).

-- Not sampled

The monitoring results show that PCB concentrations decrease to non-detectable levels within 200 feet of the slope break. Because PCBs adhere to soil and rocks and do not dissolve in or flow with water, PCBs will most likely not move away from the Upper Camp. The mountainside area with PCBs is on a rocky 30° slope that is not easy to get to. The area consists of loose lichen-covered cobbles and rocks with very little soil. Any further PCB movement should be small and not affect surface water or groundwater.

Summary of Contaminants Present at the Upper Camp (SS07)

Soil with PCBs extends about 160 to 200 feet northwest and northeast of the radar dome. About half of the contaminated area is on the mountainside, and half is on flatter ground near the radar dome, former electrical substation, and parking area. PCBs do not extend far to the east or southeast side of the radar dome and walkway (see Figure 4). The level area was capped in 1996. No interim action was proposed for the mountainside because earth-moving equipment cannot easily get to that area. PCBs adhere to soil and rocks and do not dissolve in or flow with water. Based on the results of the investigations, movement of PCBs beyond the vicinity of SS07 is unlikely.

Previous Investigations/Cleanup at Drum Disposal (LF03)

In 1995, about 25 drums were discovered within the old Waste Accumulation Area No. 2 site. The portion of the site with the drums was reopened as LF03. The following is a summary of reports that characterize the site.

Remedial Investigation of PCBs at Upper Camp (SS07), 1996

In 1995 the Air Force sampled LF03 to determine if any spills and/or leaking drums disposed at this site contaminated the soil. **Diesel range organics (DRO)**, a type of fuel

Diesel Range Organic (DRO) — A common fuel contaminant that naturally degrades over time.

contamination, were detected in the soil at levels exceeding the regulatory levels of 250 ppm with the highest concentration reported at 437 ppm.

Drum Removal (LF03), 1999

In 1997, the Air Force removed 1,290 empty fuel drums from LF03. The removed drums were all dated 1951 or 1952; thus these drums may have been buried for over 40 years. The drums were cut open, steam cleaned, crushed flat, boxed, and shipped off-site. Soil, surface water, and groundwater samples were collected. Two out of 33 soil samples had DRO values above the 250 ppm regulatory level (451 and 2,540 ppm). The sample with the higher DRO level of 2,540 ppm is an isolated hit and was collected just above the groundwater table. No adjacent or downgradient soil samples exceeded regulatory levels, and no surface water and groundwater samples exceeded regulatory levels. Some of the contaminants identified as DRO in the samples may actually be natural organic matter derived from peat weathering. No further cleanup action is recommended for the site. The site will be recorded in the base general plan.

Summary of Contaminants Present at the Drum Disposal Site (LF03)

DRO was initially detected during the 1995 field season at levels that slightly exceeded regulatory levels. Sampling results from the 1997 field event show the surface water and groundwater are clean, and only 2 out of 33 soil samples had DRO values above the regulatory level of 250 ppm. Based on the comprehensive site investigations, the DRO sample of 2,540 ppm is an isolated exceedance and there is no unacceptable risk to human health and the environment from the site.

SUMMARY OF SITE RISKS

Human health and ecological risk assessments were conducted for SS07. A copy of the assessments can be found at an information repository. No major contaminants of environmental concern were indicated at LF03 after the drums were removed; therefore, a risk assessment was not conducted for this site.

Human Health Risk Assessment

Data from SS07 were evaluated to determine the risk to human health. This evaluation is based on the location and amount of contaminant present, toxicity of the contaminant, current and potential future use of the site, and **pathways** by which people could be exposed. The human health risk assessment evaluated potential health effects of exposure of contract workers to PCBs in soil at SS07 through ingestion and skin contact. Other possible **exposure routes**, such as inhalation and transport of PCBs to ponds or drinking water, were shown to be minor or incomplete.

Aroclor 1260 (a specific type of PCB) was detected in 50 of the 55 surface soil samples. Only one other type of PCB, Aroclor 1254, was detected in one surface soil sample. Therefore, Aroclor 1260 was used as the target chemical of concern for risk assessment.

Data from the 1995 remedial investigation (Air Force, 1996a), collected in areas of SS07 that were not capped were used in the risk assessment. The areas that were not capped include isolated areas with PCBs greater than 10 ppm on the mountainside northwest of the radar dome and a small area south of the radar dome (see Figure 3). The higher levels of PCBs (see Table 1) were not discovered until 1997 and therefore are not included in the risk assessments. However, calculations using the most recent 1999 PCB levels (still higher than the 1995 levels) show that there is still less than a 1 in 100,000 chance a lifelong exposure to the soil at SS07 could result in cancer. ADEC's acceptable limit is 1 in 100,000.

Ecological Risk Assessment

An **ecological risk assessment** was also performed for Aroclor 1260 at SS07. Limited exposure of plants and animals is expected because areas of highest Aroclor 1260 concentrations have been capped, and the barren habitat at the Upper Camp is unlikely to support many plants and animals. The least weasel and

Human Health Risk Assessment — A study of the risks to human health that can be attributed to site contamination. The study can be divided into cancer risks and non-cancer risks.

Pathway/Exposure Route — Ways that people, plants, or animals could be exposed to contamination on a site.

Peales peregrine falcon were selected as representative site receptors because they are indicators of environmental conditions. Based on concentrations of Aroclor 1260, risks to the least weasel and peregrine falcon were significantly lower than ADEC's acceptable hazard quotient value of 1.0. Even with the higher 1997-1999 PCB values, the hazard quotient is still well below 1.0

CLEANUP LEVELS

In accordance with 18 AAC 75.325(f), total cancer risks across all pathways must not exceed 1 cancer per 100,000 people. Risk estimates exceeding these levels indicate the potential need for cleanup.

The results of the risk assessment suggest that under current and projected future uses of SS07, estimated maximum excess cancer risks were 2 in 1 million, well below the ADEC levels of concern.

No major contaminants of environmental concern were reported for LF03.

SUMMARY OF ALTERNATIVES

This section presents the proposed alternatives for SS07 and LF03. Two cleanup alternatives have been recommended for SS07 - No Further Action; and Inspection, Maintenance, and **Institutional Controls**. Because no major contaminants of environmental concern were reported at LF03, only one alternative is recommended - No Further Action for LF03.

Alternative 1 — No Further Action

Under the no action alternative, the site would be left in its current state, with no activities to control or mitigate exposure to site contaminants. **Natural degradation** of remaining traces of fuels at LF03 would continue to occur. PCBs at SS07 would stay at current levels without moving. No further sampling would be conducted to monitor the movement of PCBs or the rate at which natural cleanup of the fuels is occurring.

No costs are associated with Alternative 1.

Alternative 2 — Inspection, Maintenance, and Institutional Controls

This alternative only applies to SS07. Under this alternative, the Air Force would maintain long-term control of the site and inspect and maintain the existing cap. The conditions at SS07 are extreme with high winds, driving precipitation, and dense fog the majority of the year. Due to the extreme climatic conditions, human access is unlikely, and warning and restricted access signs would effectively limit access. Site access would be limited to maintenance and contractor personnel, and soil excavation would be restricted. The site would be inspected every year to ensure the integrity of the cap and the condition of warning signs. The cap and sign maintenance would occur as necessary based on the results of the visual inspection. A physical survey of the cap was performed in July 1998. This baseline survey would act as a basis of comparison for future inspections. Site restrictions, annual site inspections, and resulting maintenance would be recorded in the land records and in the base general plan for Cape Newenham LRRS. Long-term monitoring would continue to be conducted once every two years. The data would be reviewed after five years to ensure PCBs are not moving and to see if further long-term monitoring is needed.

The timeframe for this alternative is expected to be indefinite unless future circumstances lead to an alternative cleanup action that is agreed upon by the agencies. The 1995 Engineering Evaluation/Cost Analysis (Air Force, 1995) estimated annual inspection and maintenance costs at about \$2,800 per year for inspection and \$25,000 when maintenance is required. Maintenance would be required about every 10 years. Installation of 20 signs is estimated to cost \$5,000.

Ecological Risk Assessment — A study of the risks to plants and animals that can be attributed to site contamination.

Receptors — People, plants, or animals that can be exposed to contaminants.

Hazard Quotient — A way of quantifying risks to receptor species. Represents the ratio of estimated exposure dose to the chronic threshold dose.

Institutional Controls — Non-engineered cleanup mechanisms that may be used to prevent human exposure to contaminants.

Natural Degradation — The process which bacteria and other microorganisms, that occur naturally, are allowed to feed on the contaminants and, over time, reduce the contaminant levels. Toxic components of fuels and solvents degrade to less harmful and non-toxic compounds.

EVALUATION OF ALTERNATIVES

ADEC uses five criteria to identify its preferred alternative for a given site or contamination scenario. This section evaluates the two alternatives for SS07 against these criteria. No major contaminants of environmental concern were reported for LF03; therefore, an evaluation of alternatives is not necessary to identify a preferred alternative.

Protectiveness

Due to the negligible risks and unlikely exposure to PCB contamination at SS07, both Alternatives 1 and 2 would be protective of human health and the environment. Alternative 2 is more protective because institutional controls would limit access to the site, and inspection and maintenance would ensure the integrity of the cap.

Practicability

Alternative 1 would require no design, construction, implementation, and cost. Alternative 2 would require minimal design, construction, and implementation and is cost-effective.

Effectiveness

Alternative 1 is not effective in reducing long-term risks associated with contaminated soils. Alternative 2 would reduce risks by maintaining the cap indefinitely.

Regulatory Compliance

Alternatives 1 and 2 comply with all federal and state regulations.

Public Input

The Air Force will review and consider all comments received during the public comment period before making a final cleanup decision.

PROPOSED CLEANUP ALTERNATIVE

Upper Camp (SS07)

Based on the information generated from the investigations, the comparative analysis of alternatives, and the interim action performed, the Air Force and ADEC prefer Alternative 2 - Inspection, Maintenance, and Institutional Controls as the cleanup remedy for SS07.

The proposed cleanup remedy includes inspection and maintenance of the existing PCB cap and implementation of institutional controls to prevent exposure to remaining PCB contamination. Institutional controls at SS07 will include posted warning signs, limited site access, and restrictions from soil excavation at the site. Site restrictions, annual site inspections, and resulting maintenance would be recorded in the land records and in the base general plan for Cape Newenham LRRS. Long-term monitoring would be conducted once every two years. The data would be reviewed after five years to ensure PCBs are not moving and to see if further long-term monitoring is needed.

Drum Disposal (LF03)

Based on the information generated from the investigations and the interim action performed, the Air Force proposes Alternative 1 - No Further Action for LF03. Insignificant levels of fuels remain at the site and there are no major contaminants of environmental concern at this site. Natural degradation would continue for the remaining fuels, and no samples are necessary to monitor the rate at which natural cleanup is occurring.

REFERENCES

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- United States Air Force. *Draft Technical Report for PCB Monitoring & Maintenance at Cape Newenham LRRS, Cape Newenham, Alaska*. December 1999a.
- United States Air Force. *Drum Removal (LF03) at Cape Newenham LRRS, Alaska*. December 1999b.
- United States Air Force. *Revised Management Action Plan, Cape Newenham LRRS, Alaska*. February 1999c.

ACRONYMS

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
DRO	Diesel Range Organics
IRP	Installation Restoration Program
LRRS	Long Range Radar Site
PCBs	Polychlorinated Biphenyls
ppm	Parts per million
USFWS	United States Fish and Wildlife Service

How You Can Participate

You are encouraged to participate in the decision-making process regarding the Cape Newenham LRRS facility. You can comment on the proposed cleanup alternatives and cleanup standards presented in this proposed plan during the public comment period from May 8 to June 8, 2000, in two ways: send your written comments to Mr. Roger Lucio at the address below or provide verbal comments by calling the toll free 800 number. All comments must be submitted by June 8, 2000. If requested a public meeting in Platinum, Alaska can be held or the public comment period can be extended 15 days.

Your comments will help ADEC and the Air Force make a decision that is technically sound and addresses the concerns of the community. All comments will be considered by ADEC and the Air Force before making a final decision for cleanup action at the Cape Newenham LRRS sites. Depending on public comments, the actual cleanup alternative selected for each site may be the preferred alternative, a modification to the alternative, or a combination of alternatives.

The Air Force will present their comment responses in a document called a Responsiveness Summary. The decision on the cleanup action for each Cape Newenham LRRS site will be presented in a decision document. The Responsiveness Summary will be part of the decision document and will be available for review at the information repositories.

Documents regarding Air Force investigations and cleanup at Cape Newenham LRRS are kept for easy public access at the information repository at Elmendorf Air Force Base. Another information repository will be available in Platinum, Alaska. You may also contact the following agency representatives for additional information, comments, or concerns:

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PUBLIC COMMENT PERIOD

The public comment period begins on
May 8, 2000 and ends on June 8, 2000.
Comments must be postmarked by
June 8, 2000.

Name _____
Address _____
City _____
State _____ Zip _____



**NO POSTAGE NECESSARY
POSTAGE HAS BEEN PAID BY:**

MR. ROGER LUCIO
611 CES/CEV
10471 20TH STREET, SUITE 302
ELMENDORF AFB, AK 99506-2200