



U.S. AIR FORCE

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October 27, 2004

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**CONTAMINATED
SITES
FAIRBANKS**

Ms Tamar Stephens, Environmental Specialist
State of Alaska Department of Environmental Conservation
610 University Avenue
Fairbanks, AK 99709-3643

RE: Camp Lonely Landfill
Your request for information from the Department of the Air Force

Dear Ms Stephens:

Your letter of September 27, 2004 has been referred to me for response. To avoid unnecessary delays, please contact me for anything concerning Air Force environmental liability outside base boundaries. That would include even simple requests for information. The Office of the Regional Counsel has offices in San Francisco, Dallas and Atlanta. These offices are responsible for environmental litigation and claims arising outside Air Force installations. Here at the Western Regional Office, we are responsible for EPA regions 9 and 10.

Whenever a state seeks environmental enforcement against the federal government, that raises delicate questions concerning issues like sovereign immunity. The Air Force wants to be an environmental good citizen, and desires to cooperate with state agencies as much as we legally can. Therefore, we submit the following responses to your questions. However, please note that we are merely deferring, not waiving, any rights we may have.

Please consider this letter as a formal request for copies of the responses filed by the other addressees of your letter of September 27, 2004.

Your letter asks if we are aware of any other entities that may be responsible at this site. We were surprised that Husky Oil Company was not on your list. Although our understanding of the history of this site is not perfect, we believe they established and operated this landfill for most of its existence. Further, Husky's operations near Point Lonely were much, much larger than ours. We generally do not recommend participation by the Air Force in any remediation unless allocation of liability is fair and equitable. In this case, it would be difficult to see how a fair allocation can be made without the major parties paying their fair share.

As you requested, we will number our responses with the same number you put on each question.

1. Larry Lawton, Superfund Attorney/Advisor, Air Force Regional Counsel/West is the person submitting this response.
2. The United States Air Force has a radar site at Point Lonely. It is approximately 1.5 miles from the Camp Lonely landfill. The Point Lonely Radar Site was part of the Distant Early Warning System also known as the DEW line. According to a history of the DEW line authored by Lynden Harris (see the lswilson.ca website), the decision to construct a radar site at Point Lonely was made in approximately 1953-54. Construction of a Long Range Radar (LRR) station was completed at Point Lonely in approximately 1956. Air Force contractors operated the LRR

at the Point Lonely site. The primary contractors from 1956 through 1989 appear to have been ITT and RCA. Records indicate that the LRR site at Point Lonely was deactivated in September 1989 and became an unmanned site at that time. In 1992 the Air Force began construction of an unmanned Short Range Radar (SRR) at Point Lonely. It was completed in 1994. The SRR is operated remotely. The Air Force Point Lonely site shows evidence of two historical landfills and a drum storage area on property withdrawn for Air Force use. However, it is possible that Air Force contractors at Point Lonely placed waste in the landfill at Camp Lonely. One of those contractors was FELEC Services, Inc., of Colorado Springs, Colorado. We believe FELEC Services, Inc. is an ITT Company. At this time the Air Force does not know what, if any, Air Force waste was placed in the Camp Lonely landfill or who placed, stored, or disposed of waste at the Camp Lonely Landfill.

3. Copies of studies and reports funded by the Air Force are available for viewing at the following website:

adminrec.com (<http://www.adminrec.com/TOC.asp?Base=Lonely&Command=PACAF>).

4. Camp Lonely is outside the area withdrawn for Air Force use, and the Air Force has no ongoing or planned investigations at Camp Lonely.

5. Description of known releases Camp Lonely is provided in historical reports and correspondence contained in the Point Lonely administrative record.

6. Camp Lonely is outside the area withdrawn for Air Force use, however documents provided to the Air Force by ADEC and CIRI suggest that in about 1986 the Air Force contractor for Point Lonely (FELEC Services) was doing some work such as monitoring and landfill covering at Camp Lonely. An Air Force 11 September 1990 memorandum to ADEC attached a USAF response to comments report regarding "Husky Landfill (Site 32)" that noted the Air Force directed the operations contractor to revegetate the Husky Landfill to reduce seepage out of the landfill prior to closure. At this time the Air Force has found no records stating that hazardous waste was sent from the radar site at Point Lonely to the Camp Lonely landfill.

7. There is no indication that the Air Force ever leased property at Camp Lonely.

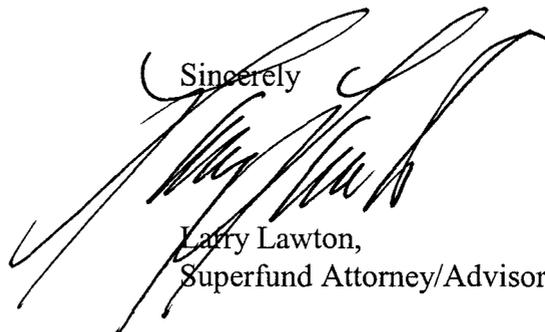
8. Old records from 1990 indicate that Ms Cathy Port, a civilian with HQ Tactical Air Command at Langley Air Force Base Virginia 23665-5542 (old phone number 804 764-4430) may have information on this matter. Other individuals with knowledge may include Chuck Hill a retired civilian formerly at Langley, Major Timothy R. McLean (stationed at Langley in 1990), and Captain Franz J Schmidt (stationed at Brooks AFB, Texas in 1990).

9. We believe Husky Oil Company was the largest contributor at this site. Their successor may be Marathon Oil.

10. The United States Government is self-insured. We are unaware of any applicable insurance policies.

If you have any questions feel free to give me a call at 415 977-8844.

Sincerely



Larry Lawton,
Superfund Attorney/Advisor