



PACIFIC AIR FORCES REGIONAL SUPPORT CENTER

INDIAN MOUNTAIN LRRS, ALASKA

EXPLANATION OF SIGNIFICANT DIFFERENCES FOR SITE OT008

INDIAN MOUNTAIN, ALASKA

**Final
December 2021**

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Acronyms and Abbreviations

°	degrees
AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
ARAR	applicable or relevant and appropriate requirement
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CL	cleanup level
CY	cubic yard
DRO	diesel-range organics
EPA	US Environmental Protection Agency
ESD	Explanation of Significant Differences
FS	Feasibility Study
FYR	Five-Year Review
JBER	Joint Base Elmendorf-Richardson
LRRS	Long Range Radar Station
LUC	land-use control
mg/kg	milligrams per kilogram
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
PCB	polychlorinated biphenyls
RAO	remedial action objective
RI	Remedial Investigation
ROD	Record of Decision
TSCA	Toxic Substances Control Act
USAF	US Air Force
USC	US Code
WACS	White Alice Communications System

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1.0 INTRODUCTION

This Explanation of Significant Differences (ESD) documents changes to the pair of remedies selected in the 2017 Record of Decision (ROD) for Indian Mountain Long Range Radar Site (LRRS) OT008 (US Air Force [USAF] 2017). This ESD also describes the conditions that justify the changes described herein to the remedial actions.

Table 1-1. Site Name and Location

Facility Name:	Indian Mountain LRRS
Site	OT008
Site Location:	16 miles East of Hughes, Alaska; Section 30; Township 08 North; Range 25 East; Kateel River Meridian
Latitude and Longitude:	66.068618 degrees (°) North, -153.689274° West
Lead Agency:	USAF
Support Agency:	Alaska Department of Environmental Conservation (ADEC)
ADEC Hazard ID Number	24275

The Air Force, as the lead agency, is providing this ESD pursuant to §117(c) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); US Code (USC) Title 42, §9617(c); and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP); Code of Federal Regulations (CFR) Title 40 §300.435(c)(2)(i) The July 1999 US Environmental Protection Agency (EPA) *Guide to Preparing Superfund Proposed Plans, Records of Decision, Explanations of Significant Differences, and Other Remedy Selection Decision Documents* (OSWER 9200.1-23P) (EPA, 1999) further provides that issuance of an ESD is appropriate when the determination has been made that the need for change to a remedial action is significant but does not fundamentally alter the overall remedy. This document will become publicly available as part of the Indian Mountain LRRS Administrative Record. A public notice of availability and brief ESD description will be posted in the *Fairbanks Daily News Miner*.

1.1 Record of Decision

The Indian Mountain LRRS Site OT008 ROD was signed by the USAF on 30 June 2017 (USAF 2017) to address polychlorinated biphenyls (PCB) and diesel-range organic (DRO) contamination present in soils located at Site OT008.

1.2 Summary of Circumstances Necessitating this ESD

After a ROD is signed, new information may be received or generated that could affect the implementation of the remedy selected in the ROD, or could prompt the reassessment of that remedy. The NCP provides a process for addressing any changes or differences identified after the ROD has been approved. These differences are classified in order of severity as non-significant/minor, significant, or fundamental. The changes identified in this ESD are categorized as significant.

The circumstances which necessitated this ESD are as follows.

- Discovery of an additional 466 cubic yards (CY) of DRO-impacted soil that was not part of the 288 CY of DRO-impacted soil identified in the ROD.
- DRO-impacted soil planned for landfarming was thought to be free of PCBs exceeding the Alaska Department of Environmental Conservation (ADEC) cleanup level. Analytical testing showed that much of the original 288 CY and newly discovered 466 CY of DRO-impacted soil contained detected concentrations of PCBs below 10 milligrams per kilogram (mg/kg). Concentrations of PCBs were intermittently dispersed throughout the DRO-impacted soil making it impractical to segregate the DRO-only impacted soil from the DRO/PCB impacted soil.

The change to the remedy identified as significant and warranting the publication of this ESD is as follows.

- Change from landfarming treatment of soil contaminated with DRO above the 18 Alaska Administrative Code (AAC) 75 (ADEC 2018) ADEC Method Two CL for ingestion (10,250 mg/kg) (2017 ROD selected remedy for DRO; Alternative 3a) to onsite comingled burial (consolidation) of DRO-impacted soil with PCB-contaminated soil and then capped (2017 ROD selected remedy for PCBs; Alternative 5).

The EPA *Guide to Preparing Superfund Decision Documents* (EPA 1999) states that changes to a component of a remedy generally are incremental changes to the hazardous waste approach selected for the Site (i.e., a change in timing, cost, or implementability).

1.3 Administrative Record

This ESD will be added to the Indian Mountain LRRS Administrative Record, maintained by the USAF at Joint Base Elmendorf-Richardson (JBER) in accordance with CERCLA Section 117(d). The Administrative Record is open for public review and available online at <https://ar.afcec-cloud.af.mil/Default.aspx> or by contacting the JBER Community Relations Coordinator as follows:

Air Force Community Relations Coordinator
Air Force Civil Engineer Center
10471 20th Street, Suite 348
Joint Base Elmendorf-Richardson, Alaska 99506-2200
1-800-222-4137

1.4 Authorizing Signatures

This signature sheet documents U.S. Air Force approval of this ESD for Site OT008 at Indian Mountain LRRS, Alaska.

By signing this declaration, the Alaska Department of Environmental Conservation concurs that when properly implemented, the selected remedy will comply with state law. If new information becomes available that indicates the selected remedy is not effective or does not provide adequate protection of human health, safety, or welfare of the environment, the remedy may need to be revised.

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Date: 2022.01.26 11:13:36 -06'00'

JUDY M. LOPEZ, GS-15, P.E.
Director, Environmental Management
Air Force Civil Engineer Center

Date


MELINDA BRUNNER

9 FEB 2022

Date

Environmental Program Manager
Federal Facilities Section, Contaminated Sites
Program Alaska Department of Environmental
Conservation

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2.0 SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

2.1 Regional History

Indian Mountain LRRS is located 35 miles south of the Arctic Circle, 18 miles east of Hughes, Alaska, and 168 miles northwest of Fairbanks, Alaska (Figure 1). Indian Mountain LRRS is owned by the Federal Government and lies within the US Bureau of Land Management Kobuk District. Constructed in 1951 as an Aircraft Control and Warning facility, Indian Mountain LRRS became operational in 1953. The 4,226-acre LRRS was constructed as two separate camps: Upper Camp and Lower Camp.

The Upper Camp was constructed at the summit of Indian Mountain, approximately eight road miles north of Lower Camp, and was the site of White Alice Communications System (WACS) infrastructure. The WACS Site for Indian Mountain was activated in 1958, deactivated in 1979, and demolished in 1986. A Minimally Attended Radar was installed in 1984, and remains active. Four contractor personnel housed at the Lower Camp currently operate the installation for the USAF.

The Lower Camp was constructed adjacent to the Indian River on or near the former site of Utopia Creek, a 1900s gold mining town, because the terrain was suitable for a landing strip. Personnel quarters and maintenance and support facilities are located at Lower Camp.

2.2 Site History

OT008 is located at Upper Camp, and comprises three areas: the former WACS, the Stained Soil Area, and the former Pump House (Figure 1). The Stained Soil Area is located approximately 1,500 feet west of the former WACS. The former Pump House is located approximately 2,750 feet south and downgradient from the former WACS. No structures are present at OT008.

Several documented large spills/leaks have occurred at the Upper Camp since the 1970s, when record-keeping began. Drummed waste products were stored at OT008, but were reportedly removed around 1980. It is believed that the demolition and excavation of the WACS, which included excavation and re-grading activities, most likely resulted in the distribution of contaminants away from the original release locations (USAF 2015a).

At this time, the contaminants of concern specific to OT008 include PCBs and DRO. The PCBs were constituents of transformer fluids and paints used at the facility.

Past activities potentially resulting in site contamination include:

- fuel storage and transfer;
- use of lubricants or solvents for vehicle and equipment maintenance activities;
- spills and leaks from the drum accumulation area at SS010, which resulted in contaminant migration to OT008;
- application of oily wastes to roads for dust control; and
- use of transformer fluids at the WACS.

2.3 Previous Investigations

The USAF, the lead agency for remedial activities, has conducted environmental investigations at the Indian Mountain LRRS since 1985 (USAF 1993, 2001, and 2002). These activities were conducted in accordance with CERCLA under the Defence Environmental Restoration Program (10 USC 2701 et seq.), which was established by Section 120 of Superfund Amendments and Reauthorization Act.

A response action in 1995 first addressed the potential for contamination to migrate between adjacent Sites SS010 and OT008. A 1995 Remedial Investigation/Feasibility Study (FS) found PCBs at OT008. Further sampling was conducted for several Indian Mountain LRRS sites during a 2002 investigation. A Focused FS in 2006 identified and evaluated remedial alternatives to address PCB contamination at OT008, including a risk assessment (USAF 2006). Excavation and disposal in the contiguous United States was recommended, but not implemented. PCB and petroleum contamination at OT008 were further delineated in 2009 and 2011; the 2015 FS (USAF 2015b) and Proposed Plan (USAF 2015a) both concurred that a response action was necessary in order to address both PCB and DRO contamination at OT008 in order to eliminate the risk to human health and the environment, and to achieve site closure. The final ROD for Indian Mountain LRRS Site OT008 was published in July 2017 (USAF 2017).

Remedial investigations (RIs) occurred in 2008 and 2011 at OT008 and several of the other Indian Mountain LRRS sites where extensive sampling for DRO; benzene, toluene, ethylbenzene, and xylenes; volatile organic compounds; semivolatile organic compounds; pesticides; PCBs; and metals were conducted (USAF 2009 and 2012).

2.4 Nature and Extent of Contamination

The estimated quantities of contaminated soil at OT008 presented in the 2017 ROD were based on findings of the 2011 RI. Quantities of contaminated soil are classified into two categories including (1) soil contaminated with only DRO, and (2) soil contaminated with both PCBs and DRO. Table 2-1 presents a summary of the 2017 ROD contaminated soil volume estimates located at each area of OT008.

Table 2-1. Estimated Volumes of Contamination per Area (cubic yard [CY])

Area	PCB/DRO	DRO Only	Total
WACS	3,307	284	3,591
Stained Soil Area	13	0	13
Pump House	12	4	16
OT008 Total			3,620

See Acronyms and Abbreviations for definitions.

2.5 ROD Selected Remedies

The 2017 ROD selected remedy for OT008 consisted of both the PCB Alternative 5 and the DRO Alternative 3a. These remedies were evaluated against other alternatives in the FS (USAF 2015b) and presented for public comment in the Proposed Plan (USAF 2015a). This combination of remedies was selected based upon its overall ability to protect human health and

the environment, comply with applicable or relevant and appropriate requirement (ARARs), achieve remedial action objectives (RAOs), and earn state and community acceptance. The remedies were recommended in order to achieve substantial risk reduction by preventing exposure to PCB contamination, including concentrations that constitute principal threat wastes, and treat DRO contamination.

The combined remedies provided the best balance of tradeoffs with respect to the CERCLA balancing criteria, implementability, long-term effectiveness, and permanence in particular. A summary of each selected remedy is provided below:

2.5.1 PCB Alternative 5

- Soil with PCB concentrations greater than 10 mg/kg would be excavated and removed from the WACS, Stained Soil Area, and Pump House, estimated at 3,090 CY to be disposed in the contiguous United States.
- Soil with PCB concentrations greater than 1 mg/kg and less than 10 mg/kg would be excavated and removed from the Stained Soil Area and Pump House, consolidated and capped beneath a minimum of 2 feet of clean fill at the WACS. Soil with PCB concentrations greater than 1 mg/kg and less than 10 mg/kg would be covered with a permeable geofabric liner prior to capping. The cap would be designed and constructed to withstand harsh environmental conditions, and would prevent exposure of humans and the environment to residual PCBs.
- Soil with PCB concentrations between 10 mg/kg and 50 mg/kg would be disposed of as non-hazardous waste.
- Soil with PCB concentrations greater than 50 mg/kg would be disposed of as hazardous waste in a Resource Conservation and Recovery Act Subtitle C facility, including those defined as a principal threat waste (greater than 500 mg/kg), would be handled, transported, and disposed of in accordance with Toxic Substances Control Act (TSCA). TSCA-regulated soils are subject to more stringent storage, transportation, and disposal requirements and would be segregated from other waste soils for that reason.
- Confirmation soil samples would be collected from the excavations to show that remaining PCB concentrations are below the CL (1 mg/kg) at the Stained Soil Area and the Pump House, and below 10 mg/kg at the lateral and vertical extents of the WACS excavation. Step-out sampling would occur at the WACS until 1 mg/kg is achieved to confirm that the cap would cover all soil above the RAO for PCBs.
- Cap extents would be surveyed and mapped. Annual land-use control (LUC) and cap inspections and maintenance as needed would be performed to ensure the long-term integrity of the cap; inspection results and photographs would be communicated in a letter report to ADEC and promptly (within one year) addressed by USAF. Preferential drainage pathways, evidence of erosion, and any instances where the geofabric liner is apparent or has been compromised would be documented and addressed.

- LUCs such as signs, fencing, and dig restrictions would be implemented to limit site access and, therefore, exposure to PCBs. Only industrial use would be permitted. USAF would be responsible for enforcing these LUCs and maintenance of these LUCs.
- A Five-Year Review (FYR) would be performed every five years in accordance with CERCLA requirements. PCB-contaminated soil, although contained under a protective cap, would remain above CLs at the WACS. The FYR would evaluate the overall effectiveness of the remedy and ensure that it remains protective over the long-term, to include the integrity of the landfill cap and the effectiveness of LUCs as well as any changes that may require re-evaluation of the remedy. Documentation from annual inspections and any subsequent maintenance performed as a result of deficiencies would be presented in the FYR reports.
- Commingled PCB- and DRO-contaminated soil would be treated as PCB-contaminated soil, and would either be removed (10 mg/kg PCBs and above) or consolidated and capped at the WACS (less than 10 mg/kg PCBs). PCBs are considered more toxic than DRO, and therefore drive risk-based decisions at the OT008.

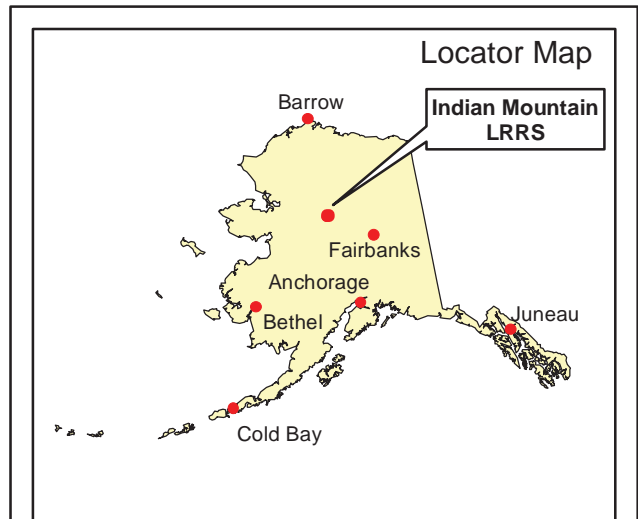
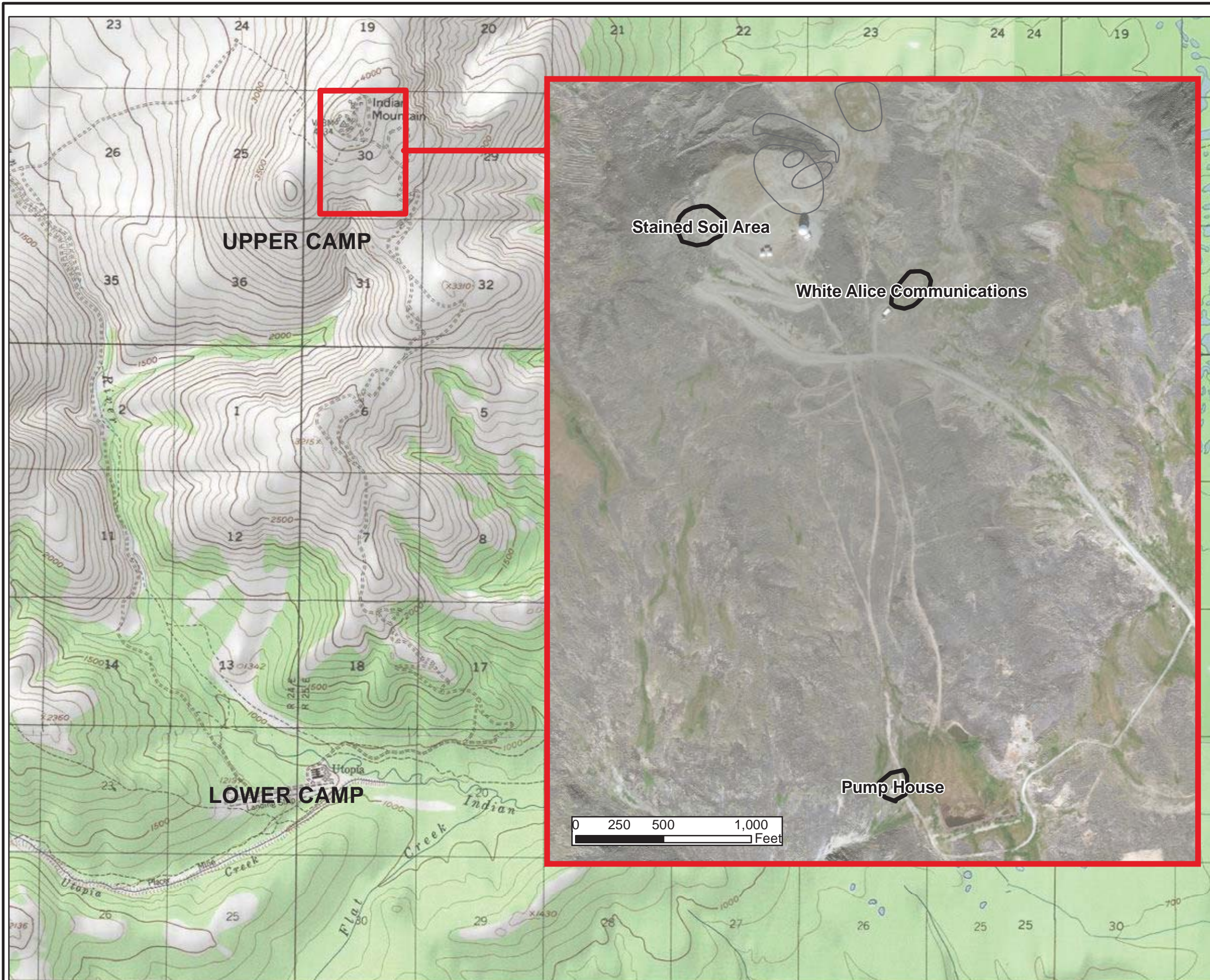
2.5.2 DRO Alternative 3a

- A topographically flat area would be selected for the landfarming treatment area to minimize the risk of erosion of the contaminated soil and runoff of sediments to adjacent undisturbed areas.
- An earthen berm around the DRO landfarm area would be constructed and used for containment. Pre-treatment samples would be collected from the proposed landfarm floor and berm to ensure that the area selected is free of contamination.
- All DRO-contaminated soil above the ADEC Method Two CL for ingestion (10,250 mg/kg DRO) would be excavated, mechanically mixed, and spread to a maximum depth of 10 inches.
- Confirmation soil samples would be taken from the excavations to show that remaining DRO concentrations are below the ADEC CL.
- Tilling would occur twice per year after the initial placing of the soil until soil samples from the landfarm show that the ADEC CL for ingestion (10,250 mg/kg) has been achieved. Tilling the soil would accelerate natural volatilization and attenuation.
- LUCs such as a temporary snow fences, signs, and dig restrictions would limit access and prevent incidental contact by workers periodically visiting the Upper Camp until the CL is achieved (approximately two years) and the area becomes suitable for unlimited use and unrestricted exposure. Only nonresidential use would be permitted. USAF would be responsible for the implementation and maintenance of these LUCs in the interim, and site restoration to include deconstruction and grading to match natural contours once treatment is complete. The fencing, signage, and restrictions would be removed upon remedy completion.
- This alternative does not require periodic reviews under State of Alaska regulations. All DRO-contaminated soil above the ADEC CL would be treated at the LRRS; once CLs are

achieved (estimated to take approximately two years), OT008 would be suitable for unlimited use and unrestricted exposure.

Selected remedies (PCB Alternative 5 and DRO Alternative 3a) were implemented in June 2020.

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Legend

 OT008 Site

Notes:
1. Source: USAF (2016)
2. Image Source: Copyright© 2013 National Geographic Society, i-cubed
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

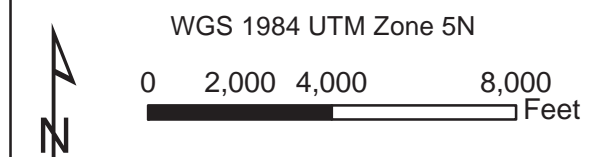



Figure 1

OT008 Site
Location and Vicinity Map
Indian Mountain LRRS, Alaska

Drawn By:	Date:	
SS	October 2020	
Checked By:	Contract No.	
LM	W911KB-14-D-00029/ W911KB20F0144	

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3.0 BASIS FOR THIS EXPLANATION OF SIGNIFICANT DIFFERENCES

The significant difference between the remedies selected in the 2017 ROD and the remedy presented in this ESD is the revision of DRO Alternative 3a remedy, which would have treated all DRO-contaminated soil above the ADEC Method Two CL for ingestion (10,250 mg/kg DRO) without PCB concentrations through onsite landfarming to instead be combined with PCB Alternative 5 soils to remain onsite, contained within a maintained cap. Therefore, the onsite consolidated area to be capped would contain both the estimated 3,332 CY of PCB/DRO-impacted soil (less than 10 mg/kg PCBs) and 288 CY of DRO-impacted soil (above 10,250 mg/kg DRO and with PCB concentrations). See Section 4.0 for impacts to the selected remedy. There would also be an additional approximately 466 CY of DRO-impacted soil removed from the WACS that would increase the total volume of contaminated soil to be managed to 4,086 CY.

The basis or reasoning for the change in selected remedy are that additional DRO-contaminated soil were discovered during the removal action and that some of the original and newly identified DRO-impacted soil was found to contain concentrations of PCB, which are not treatable by landfarming. Discussions with the ADEC concluded the two soils types (DRO and DRO containing PCBs) could be co-mingled and capped in a monofill. This change would eliminate the time and effort required to treat soil by landfarming, as landfarming would be removed as a remedy. The proposed change in remedy would require one field season to consolidate soil in the onsite capped area. LUCs would be established as required for the PCB Alternative 5 remedy, which are summarized in section 3.1.2.

3.1 Conditions

The following conditions are required to implement the change in selected remedy.

3.1.1 Capping Material

The DRO-impacted soil originally slated for the Alternative 3a remedy would not be used as capping material for the capped area. The capping material will consist entirely of non-contaminated soil from a local borrow source.

3.1.2 LUCs

LUCs consisting of signs and dig restrictions would be implemented to limit site access and, therefore, limit exposure to PCB and DRO-impacted soil. Only industrial use would be permitted. USAF would be responsible for enforcing these LUCs and maintenance of these LUCs. LUC inspections and maintenance would be performed annually.

3.2 Reviews

The proposed new remedy would require the same amount of review as was stated for the selected PCB Alternative 5 remedy, which is described below:

This alternative remedy requires FYRs under CERCLA. PCB-contaminated soil comingled with DRO-contaminated soil, although contained under a protective cap, would remain above CLs at the WACS. FYRs evaluate the overall effectiveness of the remedy and ensure that it remains

protective over the long-term, to include the integrity of the landfill cap and the effectiveness of LUCs as well as any changes that may require re-evaluation of the remedy. Documentation from annual inspections and any subsequent maintenance performed as a result of deficiencies would be presented in the FYR reports.

4.0 IMPACTS TO THE SELECTED REMEDY

The following sections discuss impacts to the 2017 ROD-selected remedy based on the latest site data evaluation.

The most significant change in the selected outcomes resulting from the ESD will be the time required to meet cleanup objectives. Since landfarming would not be used, the duration of time required for treatment through semi-annual tilling and annual sampling until cleanup objectives are met would not be a factor. Instead, LUCs would be in place as already approved for the PCB Alternative 5 and the LUCs would apply to the comingled DRO and PCB-impacted soils.

The changes outlined in this ESD comply with ARARs set forth in the 2017 ROD, other than meeting 18 AAC 75 ADEC Method Two CL for ingestion (10,250 mg/kg DRO) for soil remaining onsite, which would be managed with capping, maintenance, inspection, reporting, and an FYR process, as with the PCB-contaminated soils.

4.1 Soil Quantities

The volume of soil to be consolidated and capped within the permitted Monofill designed for LRRS conditions will increase under the changes proposed in this ESD. This planned increase in soil quantity and consolidation of contaminated soil in the Site OT008 capped soil area are outlined in Table 4-1.

Table 4-1. Revised Soil Quantities for Consolidation and Capping

Soil Description	2017 ROD Selected Remedy Estimated Quantities	2020 ESD Actual Quantities as Implemented
PCB mixed with DRO-contaminated soil	3,332	3,332
DRO-contaminated soil	288*	754
Total Quantity of Soil for Containment in the Permitted Monofill	3,332	4,086

* Soil estimated for landfarming that is now planned for onsite capping.
All quantities are in CY.

4.2 Soil Consolidation and Capping

According to the 2017 ROD for Site OT008, 3,332 CY of PCB-contaminated soil were to remain onsite beneath an earthen cap. The cap would have been constructed over an approximately 52,107-square-foot area using a minimum of 2 feet of locally-sourced clean gravel. The differences between the current intended path forward and the ROD selected remedy outlined in this ESD will revise the planned cap area as summarized in Table 4-2.

Table 4-2. Revised Cap Area

Soil to be Capped	2017 ROD Selected Remedy Cap Area	2020 ESD Cap Area
PCB mixed with DRO-contaminated soil	52,107	52,107
DRO contaminated soil	0	14,052
Total area to be consolidated and capped	52,107	66,159

All quantities in square feet.

4.3 Cost and Duration

Under the 2017 ROD selected remedies PCB Alternative 5 and DRO Alternative 3a, the total cost was estimated at \$8.31 million. With the planned revisions in remedial alternatives, the estimated cost would be \$9.12 million, or roughly \$810,110 more than the original pair of remedies. The durations for the initial structure of the remedies would lengthen from 82 days to 130 days in total. The proposed change in remedies would not impact the required LUCs prescribed in the 2017 ROD. Costs and duration estimates do not include LUC implementation or maintenance, semi-annual tilling, or annual sampling for DRO. A comparison of costs and durations between the 2017 ROD alternatives and proposed changes is provided in Table 4-3.

Table 4-3. Revised Cost and Duration

Remedy Cost	2017 ROD Selected Remedy Cost and Duration	2020 ESD Cost and Duration
PCB Alternative 5: PCB mixed with DRO-contaminated soil	\$5.85 million Project Duration: 63 days	Not Applicable
DRO Alternative 3a. Landfarming DRO-contaminated soil	\$1.46 million Project Duration: 19 days	Not Applicable
Comingling DRO-contaminated soil greater than or equal to the ADEC Method Two CL for ingestion (concentrations less than 10,250 mg/kg DRO) with PCB-contaminated soil as defined in PCB Alternative 5 (concentrations less than 10 mg/kg PCBs)	Not Applicable	\$9.12 million Project Duration: 130 days
Total Cost	\$8.31 million	\$9.12 million
Total Duration	82 days	130 days (not counting LUCs)

5.0 STATUTORY DETERMINATIONS

The selected remedies for Indian Mountain LRRS Site OT008, as stated in the ROD and modifications herein, remain protective of human health and the environment in accordance with CERCLA §121 and the NCP (Code of Federal Regulations Title 40§300.435 (c)(2)(i)). Implementing LUCs associated with remedial action at OT008 is protective of human health and the environment; complies with Federal and State of Alaska requirements (ARARs) identified in the 2017 ROD; is cost-effective; and uses permanent solutions and alternative treatment technologies to the maximum extent practicable. The remedy employs institutional controls, signage, and soil capping of the contaminated soil.

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6.0 PUBLIC PARTICIPATION

This ESD and the complete Administrative Record for Indian Mountain are available for public review as presented in Section 1.3. The ESD release notification will be posted in the *Fairbanks Daily News Miner*, to satisfy the requirements in NCP §300.435(c)(2)(i).

Written comments can be provided to the Air Force Community Relations Coordinator by letter or telephone at the address or number provided below. The Administrative Record files can be accessed at the website listed below.

Air Force Community Relations Coordinator
Air Force Civil Engineer Center
10471 20th Street, Suite 348
JBER, Alaska 99506-2200
(800) 222-4137

US EPA Records Center
Region 10
1200 Sixth Ave, Suite 900, 7th Floor
Seattle, WA 98101
(206) 553-4494
Hours: Mon – Fri, 8:30 a.m. – 4:30 p.m.

US Air Force Civil Engineer Center Administrative Record
<https://ar.afcec-cloud.af.mil/Default.aspx>

Additional information can be found in the information repository located at JBER. The information repository contains newspaper clippings and community relations documents relating to this ESD and response actions for the Environmental Restoration Program sites as maintained by the Site Project Manager (Robert Johnston).

To obtain additional information pertaining to the ESD for Indian Mountain LRRS OT-008 or to leave a message of questions or comments associated with this ESD, please contact:

Mr. Robert Johnston
US Air Force
Restoration Project Manager
AFCEC/CZOP
10471 20th Street, Suite 327
JBER, Alaska 99506
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E-Mail: Robert.Johnston.17@us.af.mil

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7.0 REFERENCES

- ADEC. 2018. Oil and Other Hazardous Substance Pollution Control Regulations: Title 18, Alaska Administrative Code, Chapter 75. October 27 2018.
- ADEC. 2011. *Landfarming at Sites in Alaska*. Technical Memorandum. Bill O'Connell, Division of Spill Prevention and Response. Contaminated Sites Program. March 2011.
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Appendix A:

Agency Comment Matrix

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REVIEW COMMENTS**PROJECT: Indian Mountain OT008****DOCUMENT: Draft ESD**

ALASKA DEPT. OF ENVIRONMENTAL CONSERVATION		DATE: 11/18/2021 REVIEWERS: Timothy Sharp	DATE: 11/26/2021 Action taken on comment by: Joe Thomas – Bethel Environmental Solutions Project Manager	
No.	Location in Document	COMMENTS	RESPONSE	RESPONSE
1.	Table 1-1	Please update the Site Location information to match the description of the Notice of Environmental Contamination recorded in February 2021 (attached).	After comparing the site location to shapefiles available from BLM, it was found that the Site Location information in the ESD/ROD and Notice of Environmental Contamination recorded in February 2021 are both incorrect. The proper MTRS information will be changed to “16 miles East of Hughes, Alaska; Section 30; Township 08 North; Range 25 East; Kateel River Meridian”	
2.	Section 3.1.2	The ESD states, “LUCs such as fencing, signs, and dig restrictions...” Please change the bold text to “including”.	The USAF does not intend to install fencing around the capped area since site visitors are infrequent and unlikely to be exposed to contamination beneath the cap or cause damage to the cap. The first sentence of Section 3.1.2 will be removed since the selected PCB Alternative 5 remedy includes fencing. The second sentence will be rewritten to state, “LUCs consisting of signs and dig restrictions would be implemented to limit site access and, therefore, limit exposure to PCB and DRO-impacted soil.”	
		- End of comments -		