STATEMENT OF BASIS

FOR CORRECTIVE ACTION COMPLETE WITHOUT CONTROLS AT COOK INLET PIPE LINE COMPANY DRIFT RIVER TERMINAL DISCHARGE DITCH, SCRAPER TRAP & FORMER BURN PIT SITE DRIFT RIVER, ALASKA

EPA DOCKET NO.: 10-97-0176-RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
SEATTLE, WASHINGTON

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INTRODUCTION

This document presents the Statement of Basis (SB) for Corrective Action Complete Without Controls under the Resource Conservation and Recovery Act (RCRA) at the Cook Inlet Pipe Line (CIPL) Company's Drift River Terminal facility located approximately 90 miles southwest of Anchorage, Alaska. Since 1967, the facility has been used for temporary storage of crude oil produced by offshore drilling platforms in Cook Inlet, prior to transfer into tanker ships for transport to refineries for processing.

In 1997, the United States Environmental Protection Agency (EPA) issued an Administrative Order on Consent (Order) to CIPL (EPA Docket No.: 10-97-0176-RCRA), pursuant to the federal Resource Conservation and Recovery Act (RCRA). The Order required CIPL to investigate three potentially contaminated Solid Waste Management Units (SWMUs) at the Drift River Terminal, and to implement cleanup actions if necessary. The three SWMUs include SWMU 10, Discharge Ditch; SWMU 11, Scraper Trap; and SWMU 19, the Former Burn Pit. In response to the Order, CIPL conducted a RCRA Facility Investigation (RFI) to evaluate the nature and extent of petroleum-related chemicals released at the facility. Only limited, low-level contamination was reported in two of the three areas of investigation (SWMUs 10 and 11), and EPA determined that no further action was needed in these locations. However, elevated concentrations of benzene and diesel range organic (DRO) compounds were found in soil and groundwater at the former burn pit (SWMU 19). These impacts were associated with wastewater management practices conducted in the area between 1967 and 1970. Based on reported contaminant concentrations, EPA and CIPL determined that corrective action was necessary at the Burn Pit.

In 2001, CIPL conducted a Corrective Measures Study (CMS) to identify and evaluate potential cleanup options for SWMU 19. After a review of available alternatives, CIPL implemented an interim remedy involving excavation of impacted soil and treatment in a new on-site bioremediation land farm unit. The goal of the remedy was to remove the contaminated soil source, treat or dispose of the petroleum contaminated soil, and restore the groundwater to drinking water standards. Interim corrective measures were successfully implemented at SWMU 19 in 2002 and 2003. EPA believes that no further action is necessary to address environmental impacts at the Drift River Terminal.

This SB presents an overview of environmental investigation and interim corrective action efforts implemented to address petroleum-contaminated soil and groundwater at the Drift River Terminal. This SB also explains why no further action is needed at any of the three SWMUs to comply with the 1997 Order from EPA. Information summarized in this SB can be found in greater detail in the RFI Report dated August 2000, the Corrective Measures Completion Report dated April 2004, and other pertinent documents contained in EPA files for this facility. EPA encourages the public to review these documents in order to gain a more comprehensive understanding of the CIPL facility and the RCRA activities that have been conducted to date. Accordingly, the documents are being made available for public review during the public comment period from September 19, 2005 through October 18, 2005. The location of these

documents and the address for submitting written comments are provided on the last page of this SB.

FACILITY BACKGROUND

The Drift River Terminal is a remote facility located on the western shores of Cook Inlet, and is accessible only by boat or aircraft. The nearest residential community is Tyonek, located approximately 50 miles northeast of the site on the west bank of Cook Inlet. This community is not accessible by road from the terminal. The communities of Kenai and Nikiski are located 25 to 30 miles east across Cook Inlet.

The Drift River Terminal includes above ground storage tanks, pipeline pumps and piping systems, a ballast water treatment system (BWTS), offices, an industrial maintenance building, housing, an airstrip and hangar, and an offshore loading platform. The facility has been operated by CIPL since its construction in 1967. Crude oil produced by offshore drilling is temporarily stored in seven, 270,000-barrel tanks and then pumped into tanker ships at the offshore loading platform located in Redoubt Bay. The tanker ships transport the crude oil to refineries for processing. During the peak operating year (1970), 224 tanker ships loaded crude oil from the facility. Since that time, crude oil production in Cook Inlet has declined.

Ballast water (sea water) is pumped into the holds of tanker ships to provide stability. The volume of ballast water carried in a ship is dependent on weather and sea conditions, and is generally greater during the winter months. Currently, ballast water containing crude oil residues is pumped from the tanker ships to the facility's ballast water storage tank prior to loading the ship with crude.

From 1967 to 1970, ballast water was pumped from the tanker ships through two, 30-inch underground pipelines to a 90,000-barrel storage tank where oil and water were allowed to separate. Crude oil separating from the ballast water was pumped through a 4-inch pipe from the storage tank to a burn pit where it was ignited. The burn pit (SWMU 19) was an unlined earthen surface impoundment with dimensions of approximately 67 feet by 74 feet and approximately 3 feet deep. Water from the storage tank was discharged to a drainage ditch on the east side of the facility property (SWMU 10) in accordance with the facility's National Pollutant Discharge Elimination System (NPDES) permit. Use of the burn pit was discontinued in 1970 when the BWTS was installed. From 1970 until 1992, the BWTS consisted of the storage tank where physical separation would occur, a dissolved air flotation (DAF) tank, a crude oil recovery (slop) tank, oil skimmers and six surface impoundments. In February 1992, the BWTS was modified to its current configuration by removing the six surface impoundments, and adding an oil/water separator, an air stripper, and an activated carbon filtration system. Since that time, only water treated by the upgraded BWTS has been released to the discharge ditch in accordance with the NPDES permit. Recovered crude oil is reinjected back into the pipeline.

RCRA INVESTIGATION SUMMARY

The first effort to evaluate the Drift River Terminal site for environmental releases, the RCRA Facility Assessment (RFA), was completed in February 1993. As a result of this assessment, 23 SWMUs and 2 areas of concern (AOC) at the site were identified as requiring further evaluation. After a thorough review of available documentation, EPA determined that no further action was required for 20 SWMUs and both of the AOCs. The three remaining SWMUs included the Discharge Ditch (SWMU 10) between the BWTS and Redoubt Bay, the Scraper Trap Sump (SWMU 11), and the Former Burn Pit area (SWMU 19). The EPA Order issued to CIPL in 1997 specifically mandated additional investigation for each of these SWMUs, as well as subsequent corrective action if needed. The RFI field sampling program was initiated in September 1998, and additional site characterization activities were performed at SWMU 19 in September 2000.

Environmental data obtained during the RFI was combined with historic compliance data (where available) and used by EPA and CIPL to: (1) document the nature and extent of contamination at each SWMU, (2) assess human health and ecological risks related to that contamination, and (3) evaluate the need for corrective actions. Findings for each of the three SWMUs are presented below.

SWMU 10, DISCHARGE DITCH

Operational History

This SWMU is an unlined discharge ditch that was used to channel treated ballast water and surface water runoff from the site to Cook Inlet. Ballast water discharged from tankers at the Terminal typically consisted of 99 percent sea water and 1 percent residual crude oil or refined petroleum product. To remove the petroleum and prepare the wastewater for discharge, ballast water was directed through a series of skimmers and surface impoundments. The onsite BWTS was constructed in 1970 and upgraded in 1992. In 1992 the treatment efficiency was increased by replacing the surface impoundments with an oil water separator, an air stripper, and a carbon adsorption system. After treatment and before release into the discharge ditch, BWTS effluent was required to meet specific NPDES permit conditions for oil and grease, total suspended solids, petroleum-related constituents such as benzene, toluene, ethylbenzene, and xylene (BTEX), and total hydrocarbons.

Environmental Investigation

Groundwater monitoring along the discharge ditch in 1988 (to support NPDES permitting activity) suggested that environmental media in the area had been impacted by petroleum hydrocarbon releases from the BWTS. Benzene was detected at a maximum concentration of 25 micrograms per liter (µg/L) in well MW-1A, located at the head of the drainage ditch. Total hydrocarbons were also reported at their highest concentration (0.17 milligrams per liter [mg/L]) in this well. According to the RFI Report (page 5-67), the discharge ditch was primarily retained

as a SWMU to confirm and further evaluate these groundwater impacts.

Soil, sediment, surface water, and groundwater samples were collected from various locations along and within the discharge ditch during the 1998 RFI effort. Isolated and low level detections of DRO and other hydrocarbon contaminants were identified in soil and groundwater along the upper portion of the discharge ditch (farthest from Cook Inlet). One surface water sample also reported DRO at the lowest measurable concentration. The highest level of DRO found in sediment from the ditch was 808 parts per million (ppm), compared to a level of concern of 250 ppm, these detections are believed to be associated with the presence of naturally occurring organic material in the form of localized coal deposits. Benzene, the primary constituent of concern in this location, was not detected in any of the RFI samples.

Risk Assessment

Using data generated during the RFI, CIPL conducted a preliminary screening of human health and ecological risks. To assess human health risks, CIPL compared reported contaminant concentrations at SWMU 10 to residential Preliminary Remediation Goals (PRGs) developed by EPA Region 9. PRGs correlate to contaminant concentrations at which elevated cancer risks and/or significant exposure to noncarcinogenic contaminants may be expected. Detailed risk assessment and/or corrective actions are typically recommended for SWMUs at which site-related contaminants were detected at concentrations greater than the PRGs. Chemicals with detected concentrations less than the PRGs are unlikely to have a significant impact on human health risks and can be eliminated from further evaluation. With the exception of DRO concentrations in sediment (which have been attributed to naturally occurring coal deposits), none of the detected contaminants at SWMU 10 exceeded PRGs. (Refer to Table 5-7 in the August 2000 RFI Report for additional detail.) Based on the lack of PRG exceedances in the surface water, sediments and groundwater, EPA finds that environmental impacts at SWMU 10 are unlikely to pose a significant threat to human health now or in the foreseeable future.

Potential ecological risks relating to SWMU 10 contamination were also assessed by comparing available data with ecological benchmarks from a variety of sources. Reported constituent concentrations at the SWMU were well below most of the conservative benchmark criteria (RCRA Facility Investigation, Draft Report, Revision 1 August 2000). Thus, none of the detected contaminants is expected to have adverse ecological effects to ecological receptors in the ditch.

Conclusion

RFI results confirm that environmental contamination at SWMU 10 is limited in areal extent and present at low levels. EPA is not requiring additional detailed human health or ecological risk assessment. EPA believes this unit poses no unacceptable risks to human health or ecological resources. Based on all available information, EPA has concluded that corrective action is complete without controls for the discharge ditch. Requirements of the 1997 EPA Order have been satisfied with regard to SWMU 10.

SWMU 11, SCRAPER TRAP

Operational History

This SWMU is a Scraper Trap used since 1967 for the temporary containment of solids removed from the crude oil pipeline. Solids (primarily paraffin) are known to accumulate in the pipeline during the course of normal operations and must be periodically removed to ensure consistent flow of oil. Approximately once every twelve days (under current operating conditions), a circular metal pig (scraper) is inserted into the pipeline upstream of the Terminal. Flowing oil pushes this scraper along the pipeline, dislodging solids built up along its entire length. Upon reaching the Terminal, the scraper and solids are directed into a trap for removal and cleaning. Crude oil in the trap can be heated to melt accumulated paraffin and assist in cleaning the scraper itself. In 1992, a bermed concrete pad was constructed to provide secondary containment for the trap and associated aboveground sump. The sump collects fluid draining from the scraper and trap (estimated at less than one gallon per cleaning run) before it is pumped back into the pipeline. Historical records indicate that several small crude oil releases occurred in this area prior to installation of the concrete pad in 1992. The Scraper Trap area was retained as a SWMU to allow for further evaluation of potentially impacted soils beneath the pad.

Environmental Investigation

During the 1998 RFI effort, soil and groundwater samples were collected from several locations at SWMU 11. DRO and residual range organics (RRO) were reported in soil samples up to 278 and 776 mg/kg, respectively. Both of these results were reported in the surface soil sample from the west side of the SWMU outside the concrete containment pad. Other petroleum-related hydrocarbon contamination was reported sporadically along the other edges of the pad. Groundwater samples collected at the scraper trap also indicated petroleum-related impacts. DRO and naphthalene were identified in each sample, along with sporadic and low levels of several volatile organic compounds (including benzene). DRO was measured at a maximum concentration of 5.78 mg/L in well point ST-2 at the southwest corner of the concrete pad. The maximum concentrations of benzene (7.79 μg/L) and naphthalene (2.0 μg/L) were both recorded for well point ST-1 at the southern end of the SWMU.

Risk Assessment

Following the procedure described above with regard to SWMU 10, CIPL used RFI data from the Scraper Trap area (SWMU 11) to assess potential risks to human health and ecological resources. Several constituents were detected during the RFI at concentrations above residential PRG levels, suggesting the potential for risks to human health in this area. In response to these exceedances, CIPL conducted an in-depth site-specific risk assessment using projected land use scenarios and known contaminant migration pathways. Calculated risk levels for the SWMU 11

area indicate no unacceptable risks to current Drift River employees or hypothetical future residents. It was also noted that future residential development in this area is unlikely (because industrial operations are expected to continue), and that any future residential drinking water wells would most likely be advanced into the deeper unimpacted aquifer (i.e., the groundwater unit currently tapped by potable onsite water supply well B).

Potential ecological risks associated with SWMU 11 were also found to be minimal. Only a few contaminants were reported in surface soil from the scraper trap area, and detected concentrations were well below ecological benchmarks (RCRA Facility Investigation Draft Report, Revision 1 August 2000).

Conclusion

RFI results confirm that environmental contamination at SWMU 11 is limited in areal extent and present at low levels. No unacceptable risks to human health or local ecological resources have been identified. Based on all available information, EPA has concluded that corrective action is complete without controls for the Scraper Trap area. Requirements of the 1997 EPA Order have been satisfied with regard to SWMU 11.

SWMU 19, FORMER BURN PIT

Operational History

This SWMU consists of a former unlined burn pit measuring approximately 67 feet (north-south) by 74 feet (east-west) and approximately 4 feet deep. The unit was constructed directly on the ground surface and surrounded by mounded soil berms. From 1967 through 1970, crude oil separated from ballast water at the BWTS (approximately 250 barrels monthly) was discharged into the pit and ignited. On occasion, this practice resulted in crude oil and residual ballast water boiling over the sides of the earthen berm where it would harden to the consistency of melted asphalt. System upgrades implemented in 1970 allowed recovered crude oil to be reinjected into the pipeline, and use of the burn pit was discontinued. Several years later, the burn pit area was leveled and graded over using heavy equipment, and the area was revegetated with grasses, willows, and alders.

Environmental Investigation

Several soil and groundwater sampling events have been conducted at SWMU 19 since the initial site investigation efforts were implemented in September 1998. Four soil borings and three monitoring wells were installed as part of the RFI. To further delineate the nature and extent of observed environmental contamination, forty-nine more soil borings, four temporary groundwater monitoring points, and three piezometers were installed in September 2000. At various stages of the investigation, samples from SWMU 19 were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), DRO, RRO, BTEX, and metals.

DRO concentrations in soil samples from inside the pit typically ranged from 5,000 to 10,000 mg/kg, but concentrations were higher in a few small areas. For example, a soil sample collected from the southeastern corner of the pit registered the highest concentrations of benzene and DRO observed during the investigation (7.79 and 39,100 mg/kg, respectively). This sample also contained significant concentrations of other BTEX and petroleum-related contaminants. Visually, impacted soil material at SWMU 19 ranges from black oily sand to gray sand with a slight hydrocarbon odor. A discontinuous layer of tar (associated with crude oil boiling over the earthen berms during historic burn events) was identified on the north side of the pit and locally within the pit itself. Chunks of burned hydrocarbon materials were also observed in the uppermost 1-1.5 feet of soil. Based on visual staining and odor, CIPL determined that soil impacts at SWMU 19 were present in an oval shaped area encompassing the former burn pit approximately 270 feet long (north to south) and 200 feet wide (east to west). The majority of soil contamination is present at a depth interval from 1.5 to 3.5 feet below the ground surface.

Groundwater beneath SWMU 19 is encountered at an average depth of only 2 to 3 feet below the ground surface, much of it passing directly through remains of the Former Burn Pit. As a result, petroleum-related contaminants observed in soil are also commonly detected in groundwater. The highest benzene and DRO concentrations in groundwater (0.042 mg/L and 16.6 mg/L, respectively) were reported at monitoring well GMP3, located directly beneath the center of the Former Burn Pit. Benzene concentrations drop rapidly outside the pit and in downgradient groundwater; the concentration had fallen to less than 5 μg/L within 75-150 feet of the pit (at wells BP-2 and GMP-2) and was not detected at all at a distance of 200 feet downgradient (at well GMP-1).

Risk Assessment

These results clearly indicate that historic burn pit operations impacted the surrounding soil and groundwater and required corrective action. As shown in Table 1, the standard cleanup approach for contaminated soil in the State of Alaska (Method 2) uses three separate cleanup values depending on the primary route of chemical exposure: ingestion, inhalation, or migration to groundwater (i.e., exposure to hazardous substances in soil by ingesting groundwater impacted by contaminants leaching from the soil). These generic concentrations were derived by ADEC using conservative exposure factors and fate and transport parameters, along with a low target risk level ($1x10^{-6}$). Alternatively, a site-specific risk assessment can be performed to derive cleanup values specific to an individual site, but this usually results in higher cleanup values than those identified in Table 1.

Table 1. State of Alaska Soil and Groundwater Cleanup Levels for Benzene and DRO

Contaminant	Maximum Soil Conc. (mg/kg)	Method 2 Soil Cleanup Levels (mg/kg)			Maximum GW Conc. (mg/L)	GW Cleanup Levels (mg/L)
		Ingestion	Inhalation	Migration to Groundwater		
Benzene	7.79	290	9	0.02	0.042	0.005
Diesel Range Organics	39,100	10,250	12,500	250	16.6	1.5

As shown in the table, concentrations of benzene and DRO detected in soil and groundwater at SWMU 19 exceeded many of their respective ADEC cleanup levels. As a result, corrective action was required by EPA pursuant to the 1997 Order.

Cleanup Goals and Remedy Selection

In February 2001, CIPL submitted a Corrective Measure Study (CMS) Report defining cleanup goals for SWMU 19 and outlining a program for corrective action (based on evaluation of a variety of cleanup options). The primary goal of corrective action at the Former Burn Pit was to remove enough contaminant source material in soil such that residual concentrations in groundwater were at or below applicable cleanup levels (listed in Table 1). Specific components of the selected remedy included:

- Removal of the uppermost layer of clean soil over the former burn pit area (approximately 1-1.5 feet thick), and stockpiling the material for later use as backfill
- Excavation of all visually contaminated soils in the former burn pit area
- Separation of oversize materials (consisting mainly of clumps of residual crude oil and hydrocarbon cemented soil) from the rest of the soil for testing and eventual recycling or reuse
- Construction of an onsite landfarm for treatment of excavated soil via bioremediation
- Confirmation sampling of groundwater around the excavation to verify that residual concentrations of benzene and DRO were at or below cleanup levels
- Backfilling and regrading of the excavation area after two subsequent groundwater monitoring events showed acceptable concentrations of benzene and DRO in groundwater directly adjacent to the unit.

Corrective Measures Implementation (CMI)

In May 2002 CIPL submitted a Corrective Measures Implementation Work Plan. CIPL initiated corrective action activities at SWMU 19 in July 2002. Preliminary groundwater sampling was

conducted to determine the extent of groundwater exceeding cleanup levels and define approximate limits of the planned excavation. At the same time, CIPL began construction of the new rectangular landfarm next to the existing ballast water treatment cell. During placement of the landfarm liner system and bedding sand, additional oil-contaminated soil (similar to that found in the burn pit) was uncovered. After consulting with EPA, CIPL excavated this soil and placed it in the BWT landfarm for treatment after screening out oversize materials (including spray foam insulation) that would inhibit the treatment process. Soil samples collected from various locations within the landfarm area excavation confirmed that impacted soil had been successfully removed and that residual contaminant concentrations were below applicable ADEC cleanup levels. Based on these findings, the excavation was backfilled with clean soil, and construction of the landfarm unit proceeded as outlined in the May 2002 CMI Workplan.

CIPL began excavation of burn pit area soil in August 2002. Over the next two months, the area had to be repeatedly dewatered to remove surface runoff and shallow groundwater accumulating in the excavation. (All collected surface runoff and shallow groundwater was sent to the onsite BWTS for treatment and eventual discharge in accordance with the facility's NPDES permit.) Because of adverse weather conditions, excavation efforts were suspended for the winter months. Consequently, this portion of the selected remedy was not completed until June 2003. During this CMI, approximately 7,000 cubic yards (yd^3) of contaminated soil, 2,000 yd^3 of clean overburden, and 330 yd^3 of oversized material were removed from SWMU 19. Samples of native soil around the perimeter and base of the burn pit excavation confirmed that ADEC cleanup goals for soil had been achieved. Benzene was not detected in any of these samples, and the highest concentration of DRO was 184 mg/kg (as compared to the cleanup level of 250 mg/kg established for protection of groundwater).

Groundwater monitoring wells installed along the downgradient perimeter of the excavation were sampled in October 2002 and late May 2003. None of these samples indicated contaminant concentrations above ADEC groundwater cleanup levels. Benzene was reported in only one sample during the first monitoring round at a concentration of 0.0013 mg/L (as compared to the cleanup goal of 0.005 mg/L). The highest concentration of DRO was measured at 1.23 mg/L (as compared to its cleanup goal of 1.5 mg/L). With two consecutive rounds of groundwater monitoring showing acceptable contaminant concentrations, CIPL concluded that cleanup goals for SWMU 19 had been achieved. Once the treated soils meet ADEC standards for reuse the soils are used for either backfill for the excavated area or other appropriate uses as determined by ADEC. No further action is required for the Former Burn Pit area, since ADEC is monitoring the landfarm area and determining the final use of the treated soil. EPA has determined that requirements in the 1997 Order have been satisfied.

Ongoing Corrective Actions

Despite the determination that no further action is needed for the former burn pit area itself, treatment of landfarmed soil will continue in accordance with the approved Burn Pit Landfarm Operations and Maintenance Plan from March 2004. Initial sampling of soil in the landfarm indicated average DRO concentrations of approximately 1,750 mg/kg, significantly less than

DRO concentrations reported in soil prior to excavation and placement in the landfarm. DRO concentrations in leachate from the landfarm have decreased from 16.1 mg/L in December 2002 to 2.5 mg/L in October 2003 (as compared to the cleanup goal of 1.5 mg/L). Ongoing treatment operations will be conducted by CIPL in accordance with ADEC regulations, and are not be regulated by the 1997 Order from EPA.

Conclusion

Confirmation sampling at SWMU 19 indicates that all environmental contamination above ADEC cleanup levels for soil and groundwater has been addressed at the Burn Pit. In the absence of ongoing exceedances, there is no need for additional corrective action in this area. Consequently, EPA has concluded that a No Further Action determination is appropriate for the Former Burn Pit area. As stated above, all the requirements of the 1997 EPA Order are satisfied with regard to SWMU 19.

OPPORTUNITY FOR PUBLIC COMMENT

EPA requests comments from the community on the proposal to discontinue RCRA investigation and corrective action and to terminate the 1997 EPA Order for the three SWMUs discussed in this SB. EPA has established a 30-day public comment period from Spetember 19, 2005 to October 18, 2005 to encourage participation in this decision-making process. EPA will respond to written public comments received during this time period, and will conduct a public meeting or hearing if it appears that public interest warrants such a meeting. If EPA determines that a No Further Action determination is inappropriate for one or more of the above referenced SWMUs, the Agency will allow additional time for public comment on the revised SB. Public comments will be summarized, along with EPA's response, in the Final Decision and Response to Comments which will be prepared subsequent to the public comment period.

If no adverse comments are received during the public comment period, EPA intends to terminate the Administrative Order on Consent.

EPA is considering holding a public meeting or hearing if there is sufficient interest. If you are interested in attending a pubic meeting please call Linda Meyer at (206)553-6636 or e-mail at meyer.linda@epa.gov by October 3, 2005.

Documents concerning RCRA investigation and corrective action efforts at CIPL's Drift River Terminal are available for public review at the following locations during normal working hours:

U.S. Environmental Protection Agency
Region 10 Headquarters
1200 6th Avenue

Seattle, Washington 98101
local phone - (206) 553-1200
toll free in Region 10 - (800) 424-4EPA

U.S. Environmental Protection Agency
Alaska Operations Office
222 West 7th Avenue, Room 537
Anchorage, Alaska 99513

To submit written comments, or to obtain further information, contact:

Ms. Linda Meyer
U.S. Environmental Protection Agency
Region 10 Headquarters
1200 6th Avenue
Seattle, Washington 98101
(206) 553-6636
meyer.linda@epa.gov