UNITED STATES AIR FORCE
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

ENVIRONMENTAL RESTORATION PROGRAM

CG039 EXPLANATION OF SIGNIFICANT DIFFERENCES

FINAL

JULY 2025

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FINAL
CG039 EXPLANATION OF SIGNIFICANT DIFFERENCES

JOINT BASE ELMENDORF-RICHARDSON, ALASKA

Prepared for
Air Force Civil Engineer Center

Contract No. W911KB20D0020

JULY 2025

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CONTENTS

TABLES

APPENDIX

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ACRONYMS AND ABBREVIATIONS

µg/L	microgram(s) per liter
AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
ARAR	applicable or relevant and appropriate requirement
CAIS	chemical agent identification set
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	*Code of Federal Regulations*
COC	contaminant of concern
EPA	U.S. Environmental Protection Agency
ESD	Explanation of Significant Differences
FFA	Federal Facility Agreement
HVE	high-vacuum extraction
JBER	Joint Base Elmendorf-Richardson
JBER-R	former Fort Richardson portion of JBER
MCL	maximum contaminant level
mg/kg	milligram(s) per kilogram
NCP	National Contingency Plan
OU	Operable Unit
PCA	tetrachloroethane
PCE	tetrachloroethylene
RAO	remedial action objective
RBC	risk-based concentration
ROD	Record of Decision
U.S.C.	U.S. Code
USAF	U.S. Air Force
UU/UE	unlimited use and unrestricted exposure
UXO	unexploded ordnance

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1. INTRODUCTION AND STATEMENT OF PURPOSE

This Decision Document presents an Explanation of Significant Differences (ESD) for CG039 located on Joint Base Elmendorf-Richardson (JBER), which is adjacent to Anchorage, Alaska (Appendix A, Figure 1). CG039 is within the former Fort Richardson portion of JBER (JBER-R).

A Record of Decision (ROD) (U.S. Army Alaska 1997b) was signed for Operable Units (OUs) A and B, both of which are associated with JBER-R. OU B consists of one site: the Poleline Road Disposal Area (Poleline Road), also known as CG039.

This ESD has been prepared to revise certain remedial cleanup levels identified in the ROD that are no longer protective to chemical-specific applicable or relevant and appropriate requirements (ARARs) promulgated subsequent to the signing of the ROD. Remedial cleanup levels for tetrachloroethylene (PCE) in soil and 1,1,2,2-tetrachloroethane (PCA) in soil and groundwater presented in the ROD were derived from risk-based concentrations (RBCs) because no U.S. Environmental Protection Agency (EPA) maximum contaminant levels (MCLs) or state cleanup levels were available for these contaminants of concern (COCs) in the specified media at that time (U.S. Army Alaska 1997b). The Five-Year Reviews performed in 2018 (USAF 2018) and 2023 (USAF 2023) determined that the RBCs selected as remedial cleanup levels for CG039 in the ROD for OU B are no longer protective of human health and the environment. State promulgated cleanup levels now exist for PCE in soil and 1,1,2,2-PCA in soil and groundwater under Title 18 Alaska Administrative Code (AAC) Chapter 75 (ADEC 2023). Table 1 provides the chemical-specific standards for the CG039 COCs that are being incorporated as ARARs through this ESD.

Table 1 Revised Remedial Cleanup Levels

COC	Medium	Revised Remedial Cleanup Level[a]
PCE	Soil	0.19 mg/kg
1,1,2,2-PCA	Soil	0.003 mg/kg
1,1,2,2-PCA	Groundwater	0.76 µg/L

[a] 18 AAC 75 Method Two Table B1 migration-to-groundwater cleanup levels for soil (PCE and 1,1,2,2-PCA) and Table C human health cleanup levels for groundwater (1,1,2,2-PCA) (ADEC 2023).

Notes:

µg/L = microgram(s) per liter
mg/kg = milligram(s) per kilogram

The U.S. Air Force (USAF) is the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) lead agency and EPA Region 10 and the Alaska Department of Environmental Conservation (ADEC) are the participating regulatory agencies. This ESD is issued in accordance with the CERCLA 117(c) 42 U.S. Code [U.S.C.] 9601 et seq. (as amended by the Superfund Amendments and Reauthorization Act of 1986 and the National Contingency Plan (NCP) (Title 40 *Code of Federal Regulations* [CFR], Section 300.435(c)(2)(i).

In accordance with 40 CFR 300.825(a)(2), this ESD and supporting documents will become part of the Administrative Record for this site. The Administrative Record is available for review online at https://ar.cce.af.mil (search under Fort Richardson, AK).

2. SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

2.1 Site Description

CG039 is located approximately 3 miles northeast of the main cantonment area of JBER-R (EPA ID AK6214522157) and lies approximately 10 miles northeast of Anchorage, Alaska, 1 mile south of Eagle River, and 0.6 mile north of the Anchorage Regional Landfill (Appendix A, Figure 1). CG039 is a low-lying, flat area bordered by an 80-foot-high hill to the west, by wetlands to the south and southwest, and by low, wooded hills on the remaining borders. Poleline Road is a gravel road along a powerline route that provides access to CG039 (Appendix A, Figure 2).

CG039 is listed in the State of Alaska Contaminated Sites Database with Hazard Identification Numbers 940 (chlorinated compounds in soil and groundwater [active]) and 28014 (potential for unexploded ordnance [UXO] in Areas A-1 and A-2 [informational]).

2.2 Site Name

The CG039 site was first noted as a contaminant source area in a November 1989 fact sheet (U.S. Army 1989). The document describes the Anchorage Mayor informing the 6th Infantry Division (Light) and U.S. Army Garrison, Alaska of a citizen previously stationed at Fort Richardson who recalled the burning of chemicals in an area close to Eagle River Flats Impact Area. The fact sheet referred to the disposal area as the Poleline Road Chemical Disposal Area. Subsequent documents referred to the area as the Poleline Road Disposal Area until 2013 when the site name CG039 first appeared in a Treatability Study Work Plan (USAF 2013b).

2.3 Early Site History

Four chemical disposal areas at CG039 were used from approximately 1950 to 1972: A-1, A-2, A-3, and A-4 (Appendix A, Figure 2). During this time, chemical agent identification sets (CAISs) and other military debris were burned and disposed of in trenches. CAIS units and other military debris were placed on pallets laid in the bottom of "bleach/lime" lined trenches before diesel fuel was used as the accelerant and ignited with thermal grenades. After burning was complete, a mixture of bleach or lime combined with chlorinated solvents such as PCE and 1,1,2,2-PCA were used to neutralize the chemical agents in the CAIS units. Associated volatile organic compound contamination was identified in soil and groundwater as a result of these activities. In brief:

- The potential for contamination at CG039 was first recorded in 1989 (U.S. Army 1989) as described in Section 2.2.
- An expanded site investigation was conducted in 1990 after the completion of a geophysical survey in June of the same year (U.S. Army Toxic and Hazardous Materials Agency 1991).
- A removal action began in 1993 and continued into 1994 (USACE 1996). Soils were excavated to a maximum depth of 14 feet at A-3 and A-4, where groundwater was encountered. Items removed included both full and empty CAIS units, carbon filter canisters, rusted drums, bottles with various contents, grenades, and many other materials. Although geophysical surveys of Areas A-1 and A-2 indicate that they contain lesser quantities of buried debris than Areas A-3 and A-4, no removal occurred in Areas A-1 and A-2 because of the potential presence of unexploded ordnance (U.S. Army Alaska 1997b).
- In 1994 and 1995, geophysical investigations were performed to determine the extent of buried material, identify whether buried debris remained in previously excavated areas, and more accurately define anomalous zones that were not excavated (Areas A-1 and A-2) in 1994 (USACE 1996).

2.4 CERCLA Actions at CG039

Fort Richardson (later designated JBER-R) was placed on the National Priorities List in June 1994, and a Federal Facility Agreement (FFA) (EPA 1994) for the installation was subsequently signed in December 1994 by the U.S. Army, EPA Region 10, and ADEC. The agreement set deadlines, objectives, responsibilities, and procedural framework for the cleanup of contaminated sites at Fort Richardson that were regulated under CERCLA. The FFA divided contaminated sites at JBER-R into four OUs, named with letters A through D. OU E was added to the FFA in 2000, the Nike Site Summit in 2011, and SS090 in 2015. OU B comprises CG039.

At the time of the 1997 OU B ROD (U.S. Army Alaska 1997b), the highest concentrations of chlorinated solvents at CG039 had been identified in Areas A-3 and A-4. No samples were collected from Areas A-1 and A-2 due to the potential presence of unexploded ordnance. However, soil and groundwater sampling conducted in surrounding areas did not detect any compounds or breakdown products associated with ordnance. Concentrations of chlorinated solvents were lower than those found near Areas A-3 and A-4. Based on available data, the Five-Year Reviews found no evidence to suggest that chlorinated solvents were disposed of at Areas A-1 and A-2. The chlorinated solvents detected in soil and groundwater there likely migrated from the adjacent Areas A-3 and A-4 (USAF 2018, 2023).

The Proposed Plan for OU B (U.S. Army Alaska 1997a) summarized six remedial alternatives considered for CG039 with respect to the nine NCP evaluation criteria, and their ability to meet the following objectives:

- Reduce contaminant levels in groundwater to comply with drinking water standards.
- Prevent contaminated soil from continuing to act as a source of groundwater contamination.
- Prevent the contaminated groundwater from adversely affecting surface water and sediments in Eagle River.
- Minimize the degradation of the State of Alaska's groundwater resources at the site because of past disposal practices.

Alternative 6, a combination of active hotspot remediation, institutional controls to prevent human exposure and contaminant migration, and long-term groundwater monitoring was identified as the preferred alternative at CG039.

The ROD for OU B signed in September 1997 (U.S. Army Alaska 1997b) documented the selection of Alternative 6 for CG039. The ROD specified the following eight major remedy components:

- Treat the "hot spot" through high-vacuum extraction (HVE) of soil vapor and groundwater in the perched and shallow zones to prevent the main threat from continuing as a source of contamination to groundwater. Soil vapors extracted from the hot spot soil will be treated as necessary to meet state and federal air quality standards before release to the atmosphere. Extraction wells will be placed in areas of highest contamination and operated until state and federal MCLs and risk-based criteria are achieved in the hot spot.
- Treat extracted groundwater through air stripping to achieve state and federal MCLs before discharge.
- Allow natural attenuation of groundwater contamination in areas outside the hot spot.
- Evaluate and modify the treatment system as necessary to optimize effectiveness in achieving remedial action objectives (RAOs).

- Monitor groundwater measurements to determine the attainment of RAOs and to detect and thoroughly characterize possible dense nonaqueous phase liquid. Duration of the HVE system is expected to be from 7 years to 12 years for soil and shallow groundwater in the hot spot and 150 years for natural attenuation of remaining groundwater to meet state and federal MCLs and risk-based criteria.
- Evaluate effectiveness of the HVE system to meet long-term restoration goals during initial implementation.
- Conduct treatability studies to evaluate innovative technologies with potential to enhance the remedial action, and implement successful innovative technologies if the initial remedy proves ineffective.
- Maintain institutional controls, including restrictions governing site access, construction, and well development, as long as hazardous substances remain at levels that preclude unrestricted use onsite. Implement restrictions on groundwater until contaminant levels are below state and federal MCLs and risk-based criteria.

The selected remedy was to be conducted in a multi-step approach because of the complexity of the contaminant characteristics and the hydrogeology of the site. The HVE system was to be installed to reduce the quantity and concentration of contaminants in the hot spot, and to prevent migration, to the maximum extent practicable, of contaminants above state and federal MCLs. Concurrently, technologies that could enhance the performance of the selected remedy were to be evaluated in a treatability study, and if these enhancing technologies were deemed effective, they would be implemented to improve performance of the selected remedy. The plume outside the hot spot would be monitored to track plume migration and the progress of natural degradation processes. If cleanup of contaminants in the hot spot did not appear to be successful, then alternative remedial action goals and/or strategies would be pursued for CG039.

COCs and remedial cleanup levels were established as indicated in Table 2.

Table 2 ROD-Established COCs and Remedial Cleanup Levels

COC	Remedial Cleanup Level	Basis for Cleanup Level[a]
Soil		
PCE	4.0 mg/kg	RBC
1,1,2,2-PCA	0.1 mg/kg	RBC
Groundwater		
Benzene	5.0 µg/L	MCL
Carbon tetrachloride	5.0 µg/L	MCL
cis-1,2-Dichloroethene	70 µg/L	MCL
trans-1,2-Dichloroethene	100 µg/L	MCL
PCE	5.0 µg/L	MCL
Trichloroethene	5.0 µg/L	MCL
1,1,2,2-PCA	52 µg/L	RBC

[a] MCLs are federal and State of Alaska drinking water standards. Calculated RBCs are based on EPA Region 3 standards to prevent leaching of soil contaminants into groundwater, and EPA Region 3 RBCs for residential drinking water at a cancer risk threshold of 10^{-4}.

Notes:

µg/L = microgram(s) per liter

mg/kg = milligram(s) per kilogram

Five-Year Reviews were required because the selected remedy resulted in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure (UU/UE). The Five-Year Review was performed to ensure that the remedy continued to provide adequate protection of human health and the environment and was functioning as intended. These reviews continue in 5-year increments until the remedy is complete.

2.5 Five-Year Reviews

The first Five-Year Review for CG039 was completed in 2003 (U.S. Army Alaska 2003). Subsequent Five-Year Reviews were performed in 2008 (U.S. Army Alaska 2008), 2013 (USAF 2013a), 2018 (USAF 2018) and 2023 (USAF 2023). The 2018 (USAF 2018) and 2023 (USAF 2023) Five-Year Reviews determined that the RBC cleanup levels in the ROD for PCE in soil and 1,1,2,2-PCA in soil and groundwater are no longer protective of human health and the environment.

3. BASIS FOR THE DOCUMENT

This ESD documents a post-ROD change to certain remedial cleanup levels contained in the September 1997 OU B ROD (U.S. Army Alaska 1997b). When no ARAR was available that directly addressed an identified COC, the ROD established RBCs for PCE and 1,1,2,2-PCA in soil based on protection of the groundwater from leaching of the contaminants (based on increased cancer risk of 10^{-4}) and established an RBC for 1,1,2,2-PCA in groundwater based on a human health risk evaluation that corresponds to a risk level of 10^{-4} for residential drinking water. A post-ROD timeline supporting a change to the RBCs currently in place as ROD remedial cleanup levels is as follows:

- In 2008, ADEC established soil and groundwater cleanup levels for PCE and 1,1,2,2-PCA.
- In 2016, USAF prepared a technical memorandum (USAF 2016) that compared the ROD cleanup levels to the new ADEC cleanup levels and also recalculated RBCs for soil (protection of groundwater soil screening levels) and groundwater (human health exposure to tapwater). The technical memorandum determined that both recalculated RBCs for soil and groundwater and the 2008 ADEC cleanup levels were lower than the remedial cleanup levels established in the ROD. Therefore, the technical memorandum recommended that an update to the ROD RBCs for PCE in soil and 1,1,2,2-PCA in soil and groundwater be completed to ensure that the remedy remains protective of human health and the environment.
- In 2017, ADEC revised soil and groundwater cleanup levels for PCE and 1,1,2,2-PCA.
- In 2018, the Fourth Five-Year Review (USAF 2018) reiterated that toxicity data had been updated and RBC cleanup levels as established in the ROD would result in unacceptable risk to human health and/or the environment remaining at the site. Recommendations included adopting newly promulgated 2017 ADEC cleanup levels in place of RBC cleanup levels.
- Similarly, in 2023, the Fifth Five-Year Review (USAF 2023) recommended that ROD RBCs be revised to reflect current ADEC cleanup standards for PCE in soil and 1,1,2,2-PCA in soil and groundwater.

As such, this ESD has been developed to modify the original ROD remedial cleanup levels for those COCs for which (1) more stringent values are warranted based on updated risk evaluations and (2) ARARs have since been established that are below the ROD-specified concentrations.

4. EXPLANATION OF SIGNIFICANT DIFFERENCES

This ESD is issued to change remedial cleanup levels for PCE in soil and 1,1,2,2-PCA in soil and groundwater. Table 3 presents the revised remedial cleanup levels in soil and groundwater that are being incorporated into the CG039 remedy-in-place. Groundwater MCLs remain unchanged since ROD signature. No revisions to these values are proposed.

Table 3 Remedial Cleanup Level Comparison

COC	Established by ROD		Revised by ESD	
	Remedial Cleanup Level	Basis[a]	Remedial Cleanup Level	Basis[b]
Soil				
PCE	4.0 mg/kg	RBC	0.19 mg/kg	Table B1
1,1,2,2-PCA	0.1 mg/kg	RBC	0.003 mg/kg	Table B1
Groundwater				
Benzene	5.0 µg/L	MCL	--	--
Carbon tetrachloride	5.0 µg/L	MCL	--	--
cis-1,2-Dichloroethene	70 µg/L	MCL	--	--
trans-1,2-Dichloroethene	100 µg/L	MCL	--	--
PCE	5.0 µg/L	MCL	--	--
Trichloroethene	5.0 µg/L	MCL	--	--
1,1,2,2-PCA	52 µg/L	RBC	0.76 µg/L	Table C

[a] MCLs are federal and State of Alaska drinking water standards. Calculated RBCs are based on EPA Region 3 standards to prevent leaching of soil contaminants into groundwater, and EPA Region 3 RBCs for residential drinking water at a cancer risk threshold of 10^{-4}.

[b] Soil values are based on 18 AAC 75 Method Two Soil Cleanup Levels (Table B1), migration to groundwater pathway and groundwater values are based on 18 AAC 75 Human Health Groundwater Cleanup Levels (Table C) (ADEC 2023).

Notes:

-- no change proposed

µg/L = microgram(s) per liter

mg/kg = milligram(s) per kilogram

5. STATUTORY DETERMINATIONS

The modifications to select remedial cleanup levels will ensure that the remedy-in-place at CG039 continues to satisfy the statutory requirements of CERCLA Section 121 (42 U.S.C. 9621) for protection of human health and the environment.

6. PUBLIC PARTICIPATION COMPLIANCE

The public participation requirements set out in the NCP, 40 CFR 300.435(c)(2)(i)(A), have been met by adding the ESD and supporting information to the Administrative Record established under CERCLA Section 300.815, and by making it available to the public in the Administrative Record located online at https://ar.cce.af.mil (search under Fort Richardson, AK). In addition, when the ESD is issued, a public notice of its availability will be published in the *Alaska Daily News* and the *Frontiersman* in accordance with 40 CFR 300.435(c)(2)(i)(B).

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7. AUTHORIZING SIGNATURES

This signature documents U.S. Air Force approval of the changes documented in this Explanation of Significant Differences for CG039, at the former Fort Richardson at Joint Base Elmendorf-Richardson in Anchorage, Alaska.

ONEILL.TAMMY.R.1022116963 Digitally signed by ONEILL.TAMMY.R.1022116963 Date: 2026.02.11 09:51:47 -06'00'

11 Feb 2026

TAMMY R. O'NEILL, NH-04, DAF
Director, Environmental Management
Air Force Civil Engineer Center (AFCEC)

Date

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This signature documents U.S. Environmental Protection Agency approval of the changes documented in this Explanation of Significant Differences for CG039, at the former Fort Richardson at Joint Base Elmendorf-Richardson in Anchorage, Alaska.

CALVIN TERADA Digitally signed by CALVIN TERADA
Date: 2025.08.06 11:27:06 -07'00'

CALVIN J. TERADA
Director, Superfund and Emergency Management Division
U. S. Environmental Protection Agency Region 10

Date

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This signature documents Alaska Department of Environmental Conservation approval of the changes documented in this Explanation of Significant Differences for CG039, at the former Fort Richardson at Joint Base Elmendorf-Richardson in Anchorage, Alaska.

DocuSigned by:
Stephanie Buss
ACA3A4435043402...

2/23/2026

STEPHANIE BUSS
Program Manager, Contaminated Sites Program
Alaska Department of Environmental Conservation

Date

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8. REFERENCES

Alaska Department of Environmental Conservation (ADEC). 2023. Title 18 Alaska Administrative Code (AAC) Chapter 75*: Oil and Other Hazardous Substances Pollution Control.* October.

U.S. Air Force (USAF). 2013a. *Third CERCLA Five-Year Review Report, JBER-Richardson, Alaska*. February.

USAF. 2013b. *Uniform Federal Policy-Quality Assurance Project Plan (UFP-QAPP), CG039-Poleline Road Disposal Area Treatability Study Work Plan, Joint Base Elmendorf-Richardson, Alaska.* September.

USAF. 2016. *Technical Memorandum Risk-Based Concentrations for PCA and PCE, CG039-Poleline Road Disposal Area, Operable Unit B, Joint Base Elmendorf-Richardson, Alaska.* July.

USAF. 2018. *Fourth CERCLA Five-Year Review Report For CERCLA Sites, JBER-Richardson, Alaska*. August.

USAF. 2023. *Fifth CERCLA Five-Year Review Report For CERCLA Sites, JBER-Richardson, Alaska*. September.

U.S. Army. 1989. *Fact Sheet: Poleline Road Chemical Disposal Area*. APVE-DE-PSE/Env Res Br Paul Steucke Jr./863-3295. November.

U.S. Army Alaska. 1997a. *Proposed Plan for Remedial Action at Operable Unit A and Operable Unit B, Fort Richardson, Alaska*. January.

U.S. Army Alaska. 1997b. *Record of Decision for Operable Units A and B, Fort Richardson, Alaska*. August.

U.S. Army Alaska. 2003. *First Five-Year Review Report for Fort Richardson, Alaska*. February.

U.S. Army Alaska. 2008. *Second Five-Year Review Report for Fort Richardson, Alaska*. February.

U.S. Army Corps of Engineers (USACE). 1996. *Remedial Investigation Report, Operable Unit B, Poleline Road Disposal Area, Fort Richardson, Alaska*. September.

U.S. Army Toxic and Hazardous Materials Agency. 1991. *Poleline Road Disposal Area Expanded Site Investigation, Fort Richardson, Alaska.* Report Number CETHA-IR-CR-91016. February.

U.S. Environmental Protection Agency (EPA). 1994. *Federal Facility Compliance Agreement, docket #1093-05-02-120.* April (received).

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Appendix A
Figures

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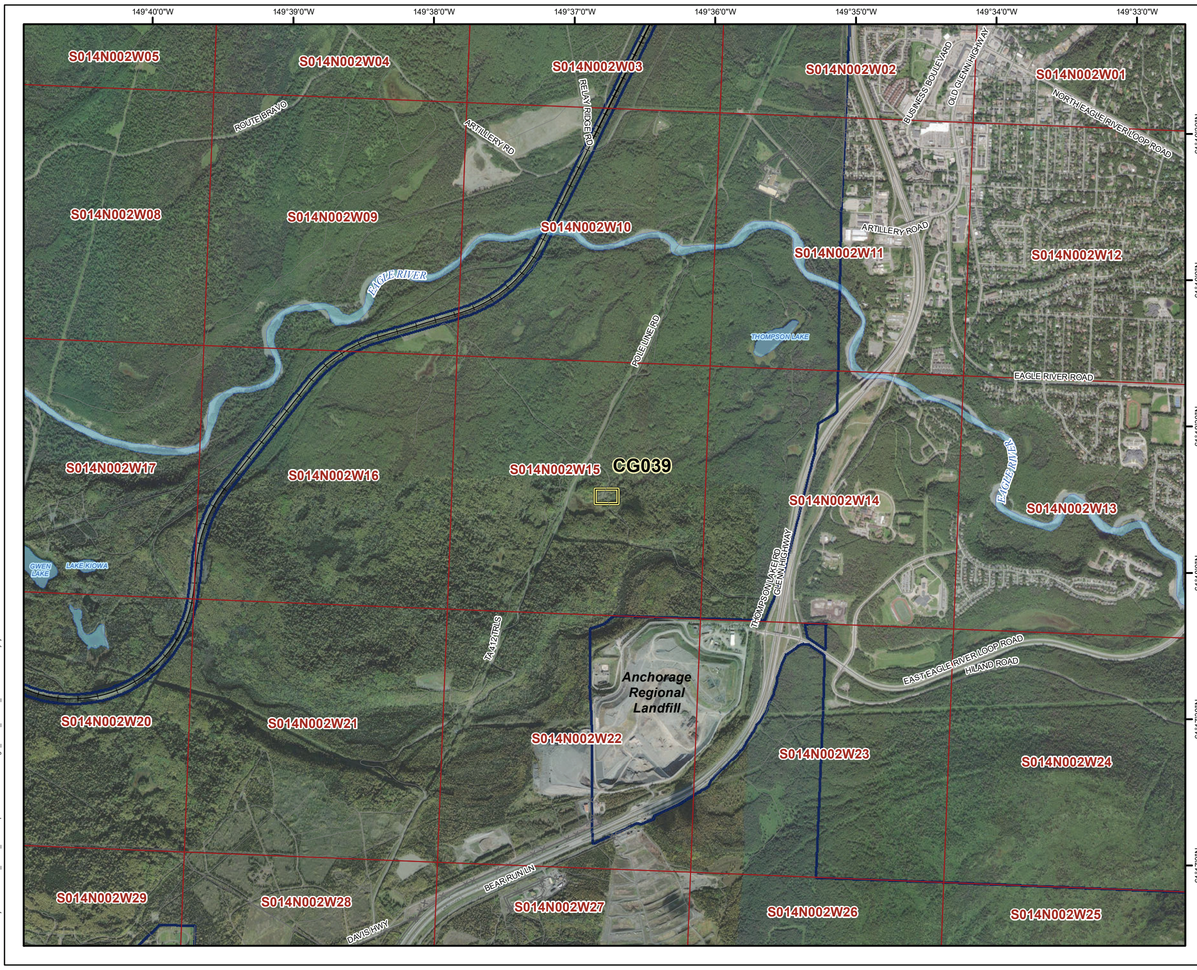

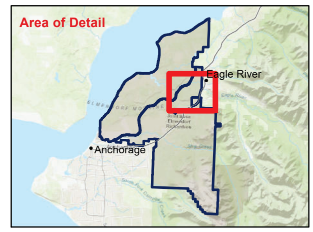

- BLM AK Section (Protracted)
- Road Centerline
- Railroad
- Fence
- CERCLA Environmental Restoration Site Boundary
- Water Body
- JBER Boundary

Acromyms
AK: Alaska
BLM: Bureau of Land Management
CERCLA: Comprehensive Environmental Resonse, Compensation, and Liability Act
JBER: Joint Base Elmendorf-Richardson

Note
CG039 is located within the NW 1/4 of SE 1/4 of Section 15, Township 14N, Range 2W, Seward Meridian, Alaska.

Sources
GIS Data:USAF GeoBase 2020
Imagery: GeoBase, JBER_19jun2023_wgs84_utm6_7.5cm_1of2.sid

1 inch = 2,000 feet

0 990 1,980 2,970 3,960
Feet

WGS 1984 UTM Zone 6N

N

CG039
LOCATION AND VICINITY
EXPLANATION OF SIGNIFICANT DIFFERENCE
JOINT BASE ELMENDORF-RICHARDSON, ALASKA

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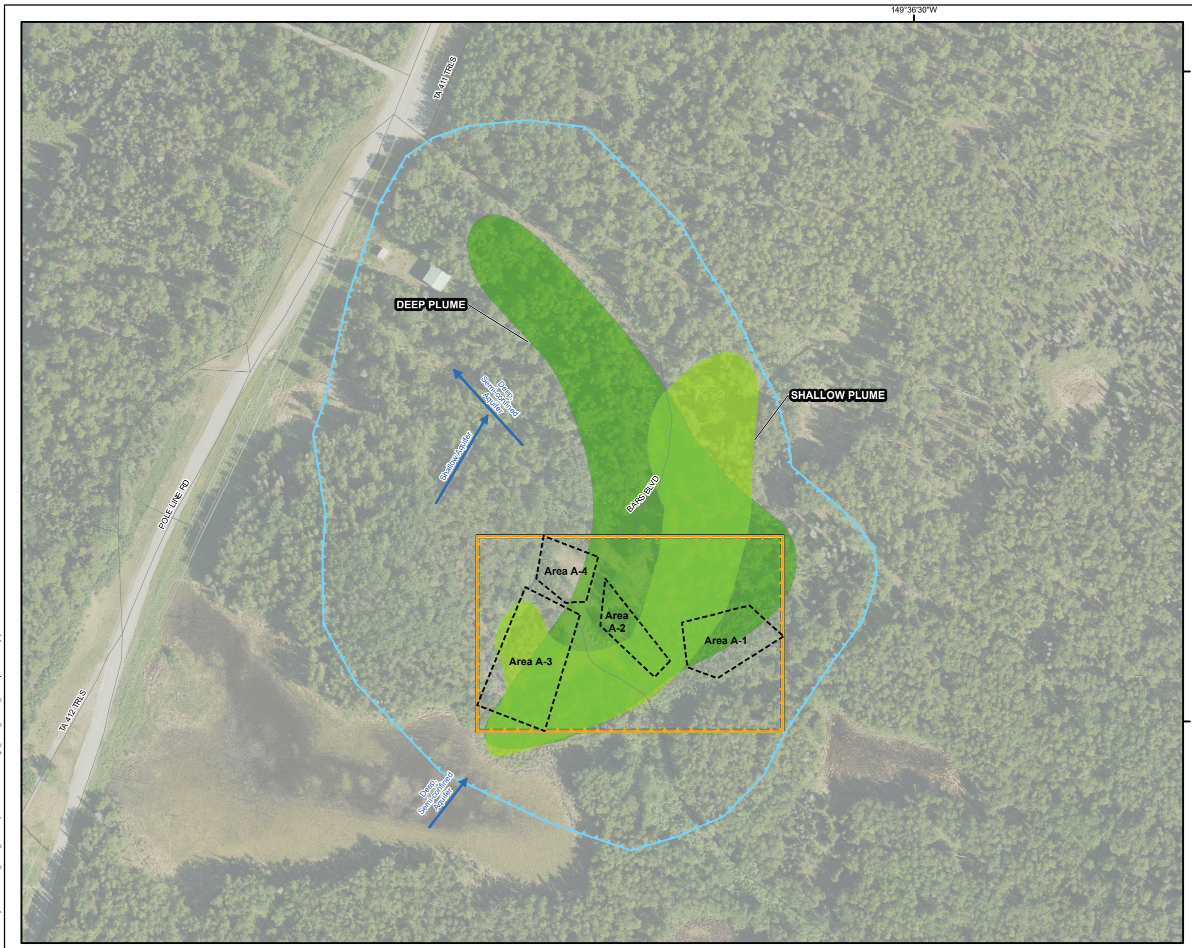

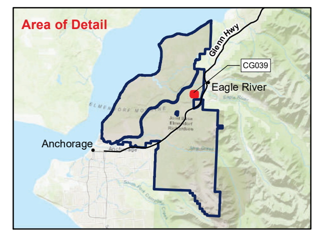

- Area of Historic Disposal
- Road Centerline
- Approximate Groundwater Flow Direction
- Land Use Control - Groundwater
- Land Use Control - Soil
- CERCLA Environmental Restoration Site Boundary
- Shallow TCE Plume in Groundwater
- Deep TCE Plume in Groundwater

Acromyms
CERCLA: Comprehensive Environmental Resonse, Compensation, and Liability Act
TCE: Tetrachloroethylene
µg/L: microgram(s) per liter

Notes
TCE plume in groundwater denotes groundwater concentrations ranging from 5 to 500 µg/L.

CG039 is located within the NW 1/4 of SE 1/4 of Section 15, Township 14N, Range 2W, Seward Meridian, Alaska.

Sources
GIS Data:USAF GeoBase 2020
Imagery: GeoBase, JBER_19jun2023_wgs84_utm6_7.5cm_1of2.sid

1 inch = 150 feet

0 75 150 225 300
Feet

N

WGS 1984 UTM Zone 6N

CG039 SITE
EXPLANATION OF SIGNIFICANT DIFFERENCE

JOINT BASE ELMENDORF-RICHARDSON, ALASKA

DATE:	PROJECT MANAGER:	FIGURE NO:
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