MEMORANDUM

CC-26-110

Resolution 26-039, a Resolution of the City Council of Homer, Alaska, Selecting a Cleanup Alternative for the HERC property with Kenai Peninsula Borough Parcel ID 17510070 to Demolish the HERC 2 Building and Not Pursue Cleanup on the Larger Building.

Item Type: Backup Memorandum

Prepared For: Mayor Lord and Homer City Council

Date: May 19, 2026

From: Julie Engebretsen, Community Development Director

Through: Melissa Jacobsen, City Manager

BACKGROUND:

The City of Homer is the recipient of technical assistance through the State of Alaska Department of Environmental Conservation (DEC) Brownfield Assessment and Cleanup Program (DBAC). This program provides state-funded technical assistance for evaluating and addressing contaminated properties. As part of this project, DEC staff visited Homer twice and gave community presentations in May 2025 and February 2026 about the program and the HERC buildings. DEC staff will also make a presentation as a visitor at the May 26th Council meeting.

The State has now completed its technical work for the City, including hazardous materials testing and an Analysis of Brownfield Cleanup Alternatives (ABCA). As part of the DBAC program, the community must select a preferred cleanup alternative. This decision is not binding and can be revised in the future.

To close out the current grant, the Resolution presented makes two recommendations:

- Demolish Building HERC 2
- Take no action on Building HERC 1 (larger building) at this time

RECOMMENDATION:

Adopt Resolution 26-039

ATTACHMENTS:

HERC 2025 ABCA Excerpt

BGES, INC.

ENVIRONMENTAL CONSULTANTS

HOMER HERC BUILDINGS
450 STERLING HIGHWAY
HOMER, ALASKA

ANALYSIS OF BROWNFIELD CLEANUP ALTERNATIVES

NOVEMBER 2025

Submitted to:

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24-053-04R2

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AAC	-	Alaska Administrative Code
ABCA	-	Analysis of Brownfield Cleanup Alternatives
ACBM	-	Asbestos-Containing Building Materials
ACM	-	Asbestos-Containing Materials
ADEC	-	Alaska Department of Environmental Conservation
AHERA	-	Asbestos Hazard Emergency Response Act
BGES	-	Braunstein Geological and Environmental Services
CFR	-	Code of Federal Regulations
cm2	-	Square Centimeter
DBAC	-	ADEC Brownfield Assessment and Cleanup
EMSL	-	EMSL Analytical, Inc.
EPA	-	Environmental Protection Agency
F/cc	-	Fiber per Cubic Centimeter
GPS	-	Global Positioning System
HBM	-	Hazardous Building Materials
HBMI	-	Hazardous Building Materials Inventory
HERC	-	Homer Education and Recreation Center
HTRW	-	HTRW, LLC
HUD	-	U.S. Department of Housing and Urban Development
KPB	-	Kenai Peninsula Borough
LBP	-	Lead-Based Paint
MDL	-	Method Detection Limit
Metiri	-	APPL, a Metiri Group Laboratory
mg/cm^2	-	Milligram per Square Centimeter
mg/Kg	-	Milligram per Kilogram
mg/L	-	Milligrams per Liter
µg/L	-	Micrograms per Liter
MS	-	Matrix Spike
MSD	-	Matrix Spike Duplicate
NESHAP	-	National Emissions Standard for Hazardous Air Pollutants
OSHA	-	Occupational Safety and Health Administration
PCB	-	Polychlorinated Biphenyls
PEL	-	Permissible Exposure Limit
PPE	-	Personal Protective Equipment
ppm	-	Parts Per Million
PQL	-	Practical Quantitation Limit
QC	-	Quality Control
QEP	-	Qualified Environmental Professional
RRP	-	Renovation, Repair, and Painting
RACM	-	Regulated Asbestos-Containing Materials
RCRA	-	Resource Conservation and Recovery Act
TCLP	-	Toxicity Characteristic Leaching Procedure
TSCA	-	Toxic Substances Control Act
TSI	-	Thermal System Insulation
XRF	-	X-Ray Fluorescence

1.0 BACKGROUND

BGES, Inc. (BGES) was retained by Flannery Ballard, Environmental Program Specialist of the Alaska Department of Environmental Conservation (ADEC), to conduct an Analysis of Brownfields Cleanup Alternatives (ABCA) of the Homer Education and Recreation Center (HERC) buildings in Homer, Alaska; hereafter referred to as the subject property (Figure 1).

1.a Site Location

The legal description of the subject property is listed by the Kenai Peninsula Borough (KPB) Property Information database as "T 6S R 13W SEC 19 SEWARD MERIDIAN HM 2000022 HOMER SCHOOL SURVEY 1999 CITY ADDN TRACT 2". The subject property is located at 450 Sterling Highway, to the northwest of the intersection of Sterling Highway and West Pioneer Avenue in the southern portion of Homer, Alaska; and is approximately 4.3 acres in size. Two buildings are present on the subject property (Figure 2).

1.b Previous Site Use(s) and Previous Cleanup/Remediation

According to the ADEC Brownfields Assessment and Cleanup (DBAC) Application, the City of Homer purchased the HERC Buildings (HERC 1 and HERC 2) in July of 2000 from the KPB, which had previously used them as a school. The buildings were constructed in the 1950s, before statehood, when construction with hazardous building materials (HBMs) was commonplace. HERC 1 is a mixed office space and community gym, and HERC 2 is abandoned due to environmental concerns.

HBMI assessments were conducted in 2020 and again in 2023 and HBMs were identified such as asbestos-containing building materials (ACBMs), lead-based paint (LBP), and polychlorinated biphenyls (PCBs). Consequently, the City of Homer applied for DBAC services to review previous HBMI assessments and provide a data gap analysis; evaluate the presence of lead in soils from LBP around both buildings; and to assist with cleanup planning by providing support with community engagement efforts and by providing an ABCA.

The subject property is listed in the ADEC Contaminated Sites database, under File Number 2314.38.043 and Hazard I.D. Number 27933.

BGES, Inc. (BGES) conducted a data gap analysis following review of the previous HBMI reports and conducted site characterization activities at the HERC buildings in Homer, Alaska between May 19 and May 21, 2025, in general accordance with the work plan prepared by BGES (dated October 9, 2024) and approved by Flannery Ballard, ADEC Project Manager, on October 24, 2024. The purpose of these

activities was to characterize and inventory HBMs for disposal purposes and to characterize potential soil contamination stemming from LBP, PCB-containing building materials, and ACBMs.

1.c Site Assessment Findings

Soil Characterization

BGES prepared a Site Characterization Report, dated August 2025, detailing the characterization activities and findings. BGES hand-dug a total of 54 test holes around the perimeter of the two buildings on the subject property to maximum depths of 2 feet below grade, including 37 test holes surrounding HERC 1 and 17 test holes surrounding HERC 2. A total of 158 field screening samples were collected from various depths within the test holes and analyzed using an x-ray fluorescence (XRF) meter to evaluate the potential presence of lead in the soils. No staining, odors, or paint chips were observed in any of the test holes, and groundwater was not encountered in any of the test holes. A total of 44 soil samples (including 4 duplicate samples) were collected from the locations that exhibited the greatest XRF results and were submitted for laboratory analysis of Resource and Conservation Recovery Act (RCRA) metals. Nine of the soil samples, including one duplicate sample pair, were also analyzed for PCBs based on their proximity to a transformer or building materials that previously tested positive for PCBs, and an additional two soil samples were collected from near the entrances to HERC 2 and were analyzed for asbestos, to evaluate potential contamination stemming from previous (apparent) uncontrolled removal of asbestos-containing materials (ACMs).

In all of the soil samples that were submitted for laboratory analysis, arsenic was the only contaminant detected above ADEC cleanup criteria for migration to groundwater, with concentrations ranging from 0.069 milligram per kilogram (mg/Kg) to 37 mg/Kg. However, it is our opinion that the reported concentrations of arsenic are consistent with naturally occurring background concentrations of arsenic in Alaska, and as such, do not appear to be indicative of a release and arsenic is not considered to be a contaminant of concern for this property.

Lead was detected in all soil samples except one at concentrations ranging from 0.057 mg/Kg to 43 mg/Kg, which are below the ADEC cleanup criterion for residential land use. Lead was detected in one sample at a concentration of 190 mg/Kg, which is below the ADEC cleanup criterion but may be at a concentration that would be considered leachable. This sample was therefore also analyzed by the Toxicity Characteristic Leaching Procedure (TCLP) to determine whether the lead within these soils may be leachable and therefore whether the soils would potentially be hazardous when excavated during future remediation activities. This sample exhibited a TCLP-lead concentration of 0.34 milligram per liter

(mg/L), which is below the RCRA-defined threshold of 5.0 mg/L. Based on this TCLP-lead result, it appears that any soil excavated from this area in the future may not need to be managed as hazardous waste.

PCBs were only detected in one sample (as aroclor-1260) at a concentration of 120 micrograms per kilogram (µg/Kg), which is below the ADEC cleanup criterion of 1 mg/Kg.

Based on these results, BGES did not identify any contamination in the soils at concentrations that exceed the ADEC cleanup criteria, with the exception of arsenic, as discussed above.

HBMI Assessment

A data gap analysis of the existing HBMIs for both buildings was performed by BGES, and a table and figures showing the HBMs for each building were compiled. The findings of this data gap analysis are briefly discussed below and are discussed in detail in BGES' Limited HBMI report, included in Appendix A. The locations of ACBMs, PCBs, and LBP detected in 2020, 2022, 2023, and 2025 are shown on Figures 3 through 6.

A 2020 HBMI of both buildings identified ACBMs such as floor tile mastic, pipe insulation, and joint compound in both buildings; LBP on the windows in both buildings; and visually assessed building materials for PCBs, concluding that light ballasts may contain PCBs, but samples for analysis were not collected.

A 2022 and 2023 HBMI of HERC 2 identified ACBMs such as floor tile and mastic, ceiling mastic, pipe insulation, joint compound, sealant and putty, and other miscellaneous building materials; LBP in windows, door frames, handrails, and other miscellaneous building materials; and PCBs in wall, door, and window paints, window glazing compounds, ceiling and floor tiles, mastic, cove base, and fiberglass insulation.

A 2023 HBMI of HERC 1 identified ACBMs such as the putty used in the exterior seams of the metal siding, window glazing compound, and a cloth within the duct system in the kitchen, and PCBs in the wall and window paints, varnish, ceiling tiles, and mastic. An LBP-survey of HERC 1 was not performed in 2023.

It is our opinion that not enough LBP characterization for disposal was performed in either building during those previous assessments. It is also our opinion that not enough potentially PCB-containing building material samples were collected for analysis from HERC 1.

BGES conducted a limited HBMI of HERC 1 on May 20 and 21, 2025. The presence of LBP was

evaluated using an XRF field-screening instrument. A total of 440 XRF readings were taken and 45 of those readings exceeded the Environmental Protection Agency (EPA) regulatory limit of 1.0 milligram of lead per square centimeter, or 1.0 mg/cm^2. Specifically, all windows in HERC 1 have LBP on one or more of their components.

Based on the results of the limited HBMI conducted by BGES, both buildings will require TCLP-lead determinations, unless materials will be assumed to be hazardous for disposal purposes. Building materials containing PCBs are generally not permitted at landfills in Alaska, though some regional landfills (such as Anchorage Regional Landfill) may permit materials with concentrations less than 1 mg/Kg. Materials containing PCB concentrations exceeding 1 mg/Kg are not acceptable at any landfills in Alaska. Because of the presence of LBP and PCB-containing building materials within both buildings, additional testing for LBP (including paint chip analysis and/or TCLP analysis) and PCBs will likely be required if those materials will be abated prior to demolition and disposal of the building debris.

1.d Project Goal

Following the City of Homer's purchase of the HERC Buildings and based on the conditions of the two buildings, the City of Homer applied for DBAC services for assistance with characterizing any HBMs or contaminated soils on the subject property. These activities included a review and a data gap analysis of previous HBM surveys; completing a limited HBMI as needed for HERC 1; soil assessment activities around both buildings to evaluate the potential presence of lead from LBP; and to assist with cleanup planning by providing an ABCA and by providing support with community engagement efforts, so that the City has sufficient information to proceed with demolition of the buildings and to remediate the property. It is our understanding that grant-provided funding may be available for future phases of this project, but may only be used for assessment, abatement, and/or disposal of HBMs. Any costs associated with removal or disposal of nonhazardous building materials will be the responsibility of the City of Homer.

In order to accomplish this objective, this ABCA presents several options for removal and disposal of the HBMs from the subject property.

2.0 APPLICABLE REGULATIONS & CLEANUP STANDARDS

2.a Cleanup Oversight Responsibility

Remediation and/or demolition of the subject property will be regulated by the ADEC. The ADEC Project Manager for this project is Flannery Ballard.

2.b Cleanup Standards for Major Contaminants

The primary contaminants of concern at the project site include HBMs such as asbestos, LBP, and PCBs.

According to the National Emissions Standard for Hazardous Air Pollutants (NESHAP), ACM is defined as materials containing at least 1 percent asbestos; including but not limited to chrysotile, amosite, tremolite, actinolite, and crocidolite asbestos. Based on the results of the limited HBMI conducted by BGES, many of the building components in each building meet this definition.

In accordance with the EPA regulatory limit, any materials containing 1.0 milligram per square centimeter (mg/cm^2) of lead are considered to be LBP. Based on the results of the limited HBMI conducted by BGES, many of the building components in HERC 2 and the windows, doors, and exterior walls of HERC 1 meet this definition.

According to the Toxic Substance Control Act (TSCA) in 40 CFR Part 761, PCB bulk product waste is defined as containing PCBs at a concentration of greater than, or equal to 50 mg/Kg. Based on the results of the limited HBMI conducted by BGES, none of the building components that were tested for PCBs meet this definition. However, various building materials have been found to contain up to 19 mg/Kg PCBs, and no landfills in Alaska are permitted to accept waste with these concentrations of PCBs.

2.c Laws & Regulations Applicable to the Cleanup

Asbestos-Containing Materials

All work involving abatement or demolition of ACM should be conducted in accordance with the NESHAP established by the US EPA. As such, friable ACM and some categories of non-friable ACM must be properly encapsulated or abated before general demolition or renovation activities may occur. Both friable and non-friable ACMs exist on the subject property and the project therefore involves Regulated ACM (RACM). Demolition or renovation of buildings containing RACM requires prior notification to the US EPA.

A material is considered RACM if it fits these criteria:

- Friable ACM.
- Category I non-friable ACM that has been, or will be exposed to forces during demolition or removal that may disturb the material and cause it to become friable. This includes, but is not limited to, grinding, cutting, sanding, and abrading.

- Category II non-friable ACM that has been, or will be exposed to forces during demolition or renovation that may disturb the material, causing it to become crumbled, pulverized, or reduced to a powdered form.

According to NESHAP regulations, RACM need not be removed before demolition or renovation if it meets the following criteria:

- It is Category I non-friable ACM that is in good condition.
- It is enclosed in concrete or other similarly hard material and is adequately wet when it is exposed during demolition or renovation.
- The RACM was discovered after demolition or renovation began and it cannot be safely removed.
- It is Category II non-friable ACM and there is a low probability that the material will become disturbed during demolition or renovation.

According to the Occupational Safety and Health Administration (OSHA), the permissible exposure limit (PEL) for asbestos is 0.1 fiber per cubic centimeter (f/cc) of air as an 8-hour time-weighted average. The Excursion Limit is 1.0 f/cc averaged over a 30-minute period. Because the ACM at the subject property includes surfacing, the demolition or abatement of the ACM constitutes Class I work; presenting the greatest potential risk to the personnel handling the ACM. The demolition or abatement activities must be conducted by properly certified personnel, taking appropriate safety precautions.

Under OSHA's construction standard, OSHA classifies construction activity according to descending degree of risk, with Class I work presenting the greatest potential risk and class IV the lowest.

- Class I work involves the removal of Thermal System Insulation (TSI) and surfacing ACM or PACM.
- Class II work involves removal of any other ACM that is not TSI or surfacing ACM.
- Class III work includes repair and maintenance activities where employees are likely to disturb ACM.
- Class IV work is defined as maintenance and custodial activities during which employees contact ACM or PACM, including waste and debris cleanup.

Lead-Based Paint Containing Materials

On September 15, 1999, U.S. Department of Housing and Urban Development (HUD) published final regulations to implement Sections 1012 & 1013 of Title X, which set forth specific policies on LBP hazard reduction in federally assisted and federally owned housing (24 CFR Part 35 — Requirement for Notification, Evaluation and Reduction of Lead-Based Paint Hazard in Housing Receiving Federal

Assistance). This rule is a comprehensive amendment of previous federal housing LBP regulations and consolidates HUD LBP requirements into one part of the CFR. HUD guidelines are applicable for a dwelling that contains LBP at 1.0 mg/cm^2 or more. In most cases, HUD guidelines also require disclosure of the presence of LBP in building materials to any future tenants or owners of the property.

Between 2008 and 2013, the U.S. EPA promulgated the Renovation, Repair, and Painting (RRP) guidelines pertaining to renovation, repair, and painting projects that disturb lead-based paint in homes, child care facilities and pre-schools built before 1978, and it requires contractors to have their firm certified by EPA (or an EPA-authorized state), use certified renovators who are trained by EPA-approved training providers, and follow lead-safe work practices.

PCB-Containing Materials

TSCA regulations apply when PCBs are determined to be present at concentrations exceeding 50 mg/Kg in solid wastes. TSCA-regulated PCB bulk product waste may be disposed of in a facility permitted, licensed, or registered by a State as a municipal or non-municipal non-hazardous waste landfill provided the waste is one of the following: plastics (such as plastic insulation from wire or cable; radio, television and computer casings; vehicle parts; or furniture laminates); preformed or molded rubber parts and components; applied dried paints, varnishes, waxes or other similar coatings or sealants; caulking; Galbestos; non-liquid building demolition debris; or non-liquid PCB bulk product waste from the shredding of automobiles or household appliances from which PCB small capacitors have been removed (shredder fluff), or is a PCB bulk product waste, sampled in accordance with the protocols set out in 40 CFR 761 subpart R, that leaches PCBs at <10 micrograms per liter (µg/L) of water measured using a procedure used to simulate leachate generation.

Additionally, PCB waste disposal records and reports must be maintained in accordance with 40 CFR 761 subpart K.

State of Alaska Landfill Disposal Requirements

The ADEC has issued guidance regarding disposal requirements for building materials from non-residential facilities with LBP. For more information regarding material disposal options, please refer to the ADEC publication titled "*Non-Residential Lead-Based Paint Guidance Document*" (dated April 2024), which discusses disposal limitations based on total lead and TCLP-lead concentrations.

In Alaska, materials with detections of PCBs are generally not permitted in rural landfills. The maximum allowable PCB concentration for disposal of building materials in some landfills (such as the Anchorage Regional Landfill) is 1.0 mg/Kg. Some landfills may have further restrictions regarding disposal of PCBs.

3.0 EVALUATION OF CLEANUP ALTERNATIVES

In addition to the alternatives listed below, BGES evaluated some options that were ultimately omitted from the analysis for various reasons. BGES considered disposal of HBMs at the Homer Transfer Facility in Homer, Alaska; however, this transfer facility currently prohibits disposal of these items.

BGES considered disposal of HBMs at the Central Peninsula Landfill in Soldotna, Alaska since this facility does accept ACM and lead-based paint waste passing the 5 mg/L TCLP threshold; however, this landfill currently prohibits disposal of materials containing more than 1 mg/Kg PCBs. Additionally, the landfill may require additional characterization of the LBP waste prior to acceptance, such as paint chip analysis and TCLP analysis.

BGES considered disposal of HBMs at the Anchorage Regional Landfill in Eagle River, Alaska; however, this landfill currently prohibits disposal of materials generated outside of the Municipality of Anchorage.

BGES considered abatement and disposal of all HBMs at the Columbia Ridge Landfill in Arlington, Oregon and disposal of the remaining building debris in the Homer Inert Waste Monofill; however, the local community has expressed their disinterest in this alternative as they would be responsible for the costs associated with disposal of the non-hazardous building debris.

3.a Cleanup Alternatives Considered

The following alternatives were considered as options for remediating the subject property:

a) **No Action:** The ACM, LBP, and PCBs on the subject property would not be abated and the buildings would not be demolished. This alternative is not desirable to the local community, because the presence of HBMs may constitute a health risk for site visitors.
b) **Encapsulation of LBP only in both buildings:** This alternative consists of encapsulating LBP throughout both buildings on the subject property, in order to protect the public from exposure. This alternative is not desirable for HERC 2, which has already been boarded and closed to the public; however, the local community may consider this alternative agreeable as a short-term solution for HERC 1 while the fate of this building is decided.
c) **Further testing and analysis of building materials:** This alternative would focus on materials deemed to contain or potentially contain LBP and/or PCBs, in order to better define an abatement scope of work and to ultimately only remove those building materials that are hazardous. This alternative is not desirable to the local community due to the time that would be required for additional testing, and because the community would then be responsible for demolition of the

nonhazardous building materials; something they have voiced as not being a desirable option.

d) **Abatement and local disposal of ACM and removal and disposal of the remaining structures off-site (outside of Homer)**: Because there are no feasible options for local disposal of LBP or PCB-containing building materials without further characterization of the LBP and PCBs, only the ACMs would be physically removed from the buildings and placed in the Central Peninsula Landfill in Soldotna, Alaska. The buildings on the subject property would then be demolished, and the building materials would be transported to the Columbia Ridge Landfill in Arlington, Oregon for disposal as LBP- and PCB-containing waste. This alternative is favorable to the local community.

e) **Abatement via disposal of both buildings (outside of Homer):** This option would include removal of the entire structures and off-site disposal. The buildings on the subject property would be demolished and shipped to the Columbia Ridge Landfill in Arlington, Oregon for disposal as ACM-, LBP-, and PCB-containing waste. This alternative is favorable to the local community.

3.b Details of Cleanup Alternatives

Each alternative was evaluated for effectiveness, implementability, and cost.

Effectiveness

a) **No Action:** This option would not be effective in controlling or preventing the exposure of receptors to hazardous materials at the site. If this action were selected, the buildings would continue to deteriorate and potentially pose a risk to public health.

b) **Encapsulation of LBP only in both buildings:** This option would be effective in the short term to prevent exposure to LBP, but would not be effective in preventing exposure to other hazardous materials, and ineffective in supporting the City's objective of repurposing the subject property.

c) **Further testing and analysis of all building material components:** This option would include further investigations regarding the presence of ACM, LBP, and PCBs in order to refine cost estimates for disposal of each building material. In conjunction with another alternative, this option would be effective in accomplishing the goal of demolition and eventual repurposing of the subject property.

d) **Abatement and local disposal of ACM and removal and disposal of the remaining structures off-site (outside of Homer)**: This option would be effective in accomplishing the goal of demolition and eventual repurposing of the subject property.

e) **Abatement via disposal of both buildings (outside of Homer):** Abatement of the entire buildings and disposal in the Columbia Ridge Landfill in Arlington, Oregon as a hazardous waste stream

would be effective in preventing receptors from coming into contact with ACMs, LBP, and PCBs; and in supporting the community's objective of removing the buildings and repurposing the subject property.

Implementability

a) **No Action:** This option requires no effort and is thus easy to implement.
b) **Encapsulation of LBP only in both buildings:** This option would consist of retaining an abatement company to encapsulate the LBP in the buildings, which can be accomplished fairly easily.
c) **Further testing and analysis of all building material components:** This option would require extensive surveying and sampling which would be moderately difficult to accomplish and would prolong the overall process of demolition and repurposing of the subject property.
d) **Abatement and local disposal of ACM and removal and disposal of the remaining structures off-site (outside of Homer)**: This option would require further investigation of the ACMs to ensure they do not also contain LBP or PCBs, which would be moderately difficult to accomplish and would prolong the overall process of demolition and repurposing of the subject property.
e) **Abatement via disposal of both buildings (outside of Homer):** Abatement by removal and disposal in the Columbia Ridge Landfill in Arlington, Oregon would require retaining an abatement contractor to containerize the building materials for transportation to a distant disposal facility, which would be relatively easy to coordinate. This option would not require any further testing.

Cost

The rough order of magnitude costs associated with each remedial alternative described in this report are listed below. Please note, the costs are assuming both buildings would be demolished and transported for disposal concurrently. If the buildings were to be demolished and disposed of at separate times, the costs would increase to potentially double due to the costs of arranging transport, which include preparing transport manifests, and multiple mobilizations.

a) **No Action:** There are no costs associated with taking no action.
b) **Encapsulation of LBP only in both buildings:** The estimated cost of encapsulating the LBP in both buildings is $60,000.

Table 1. Cost of encapsulation of LBP only in both buildings (Alternative b)

Item	LBP Abatement		Transportation & Disposal	Total
Professional Labor - Abatement Contractor Mobilization & Labor; assumes 10 days work total for both buildings	$60,000		-	$60,000
Project Total				**$60,000**
Contingency (-30% / +50%)			***$42,000 to $90,000***	
Mobilization & Labor per building if work not performed concurrently	*HERC 1*	*HERC 2*	*Total*	*$63,360*
	$45,480	*$17,880*	*Contingency*	*$45,000 to $95,000*

c) **Further testing and analysis of all building material components:** The estimated cost of performing additional testing and analysis is $30,000.

Table 2. Further testing and analysis of all building material components (Alternative c)

Item	Work Plan	Sampling & Analysis	Reporting	Total
Professional Labor - Env Consultant; includes workplan and final report, and fieldwork time	$2,610	$7,820	$3,690	$14,120
Mobilization Costs; assumes 3 days work for both buildings	-	$1,130	-	$1,130
Analytical Costs; assumes 50 samples analyzed for Total Lead, TCLP-Lead, and PCBs	-	$14,750	-	$14,750
Project Total				**$30,000**
Contingency (-30% / +50%)			***$21,000 to $45,000***	
Reporting, Field Work, and Analysis per building if work not performed concurrently	*HERC 1*	*HERC 2*	*Total*	*$32,401*
	$24,929	*$7,472*	*Contingency*	*$22,700 to $49,000*

d) **Abatement and local disposal of ACM and removal and disposal of the remaining structures off-site (outside of Homer)**: The estimated cost of abating the ACMs for disposal in the local landfill, and disposing of the remaining building debris in the Columbia Ridge Landfill in Arlington, Oregon is $10,300,000.

Table 3. Abatement and local disposal of ACM and removal and disposal of the remaining structures off-site (outside of Homer) (Alternative d)

Item	Abatement & Demolition	Transportation & Disposal Logistics	Disposal Costs - ACM	Total
Professional Labor - Abatement & Demolition Contractor; assumes 15 workers for 28 days	$300,000	-	-	$300,000
ACM Disposal; assumes 34 tons	-	-	$6,800	$6,800
LBP & PCB Transport & Disposal; includes manifest and Canadian Transit fees, containers, assumes 10,094 cubic yards	-	$9,993,200	-	$9,993,200
Project Total				**$10,300,000**
Contingency (-30% / +50%)			***$7,210,000 to 15,450,000***	
Abatement Labor & Disposal Fees per building if work not performed concurrently	*HERC 1*	*HERC 2*	*Total*	*$10,617,573*
	$3,802,684	*$6,814,889*	*Contingency*	*$7,432,000 to $15,926,000*

e) **Abatement and disposal of both buildings:** The estimated cost of disposal of all building debris as hazardous waste in the Columbia Ridge Landfill in Arlington, Oregon is $10,500,000.

Table 4. Abatement and disposal of both buildings (Alternative e)

Item	Abatement & Demolition	Transportation & Disposal	Total
Professional Labor - Abatement & Demolition Contractor; assumes 15 workers for 28 days	$290,000	-	$290,000
ACM, LPB, & PCB Transport & Disposal; includes manifest and Canadian Transit fees, containers, assumes 10,286 cubic yards	-	$10,210,000	$10,210,000
Project Total			**$10,500,000**
Contingency (-30% / +50%)			***$7,350,000 to 15,750,000***
Abatement Labor & Disposal Fees per building if work not performed concurrently	*HERC 1*	*HERC 2*	*Total* *$10,673,584*
	$4,339,224	*$6,334,361*	*Contingency* *$7,472,000 to $16,010,000*

3.c Recommended Cleanup Alternative

Based on the effectiveness, implementability, and cost of each alternative, as discussed above, Alternative D would be the best option for meeting the community's objectives. Therefore, it is recommended that remediation of the subject property be accomplished by abating all ACMs for disposal in the Central Peninsula Landfill in Soldotna, Alaska prior to demolishing the buildings and transporting the remaining building debris to the Columbia Ridge Landfill in Arlington, Oregon for disposal as hazardous waste. This option would be effective in removing hazardous materials from the subject property and allowing the community to repurpose the property as they see fit. An abatement contractor who is familiar with transportation and disposal requirements would coordinate this effort. The estimated cost of this alternative is $10,300,000.

4.0 REFERENCES

18 AAC 75 *Oil and Other Hazardous Substances Pollution Control, Revised as of October 18, 2023.* State of Alaska, Department of Environmental Conservation, Juneau, Alaska.

24 CFR 35.1320 *Lead-based paint inspections, paint testing, risk assessments, lead-hazard screens, and reevaluations.* United States of America, Department of Housing and Urban Development, Washington, D.C.

29 CFR 1910.120 *Hazardous waste operations and emergency response, as of May 14, 2019.* United States of America, Occupational Safety and Health Standards, Washington, D.C.

40 CFR 763 Subpart E Appendix E. *Asbestos-Containing Materials in Schools, October 30, 1987.* United States of America, Environmental Protection Agency, Washington, D.C.

40 CFR 261.24 *Toxicity Characteristic, Revised as of January 3, 2017.* United States of America, Environmental Protection Agency, Washington, D.C.

ADEC, February 2021. *Alaska Pollutant Discharge Elimination System General Permit from Discharges from Large and Small Construction Activities (Construction General Permit).* State of Alaska, Department of Environmental Conservation, Juneau, Alaska.

ADEC, April 2020. *Alaska Pollutant Discharge Elimination System Multi-Sector General Permit (MSGP) for Storm Water Discharges Associated with Industrial Activity.* State of Alaska, Department of Environmental Conservation, Juneau, Alaska.

ADEC, March 2017. *Site Characterization Work Plan and Reporting Guidance for Investigation of Contaminated Sites.* State of Alaska, Department of Environmental Conservation, Juneau, Alaska.

ADEC, August 2025. *Field Sampling Guidance.* State of Alaska, Department of Environmental Conservation, Juneau, Alaska.

ADEC, August 2022. *Guidelines for Data Reporting – Technical Memorandum.* State of Alaska, Department of Environmental Conservation, Juneau, Alaska.

Environmental Management, Inc., March 2020. *Hazardous Building Materials Survey.* Anchorage, Alaska.

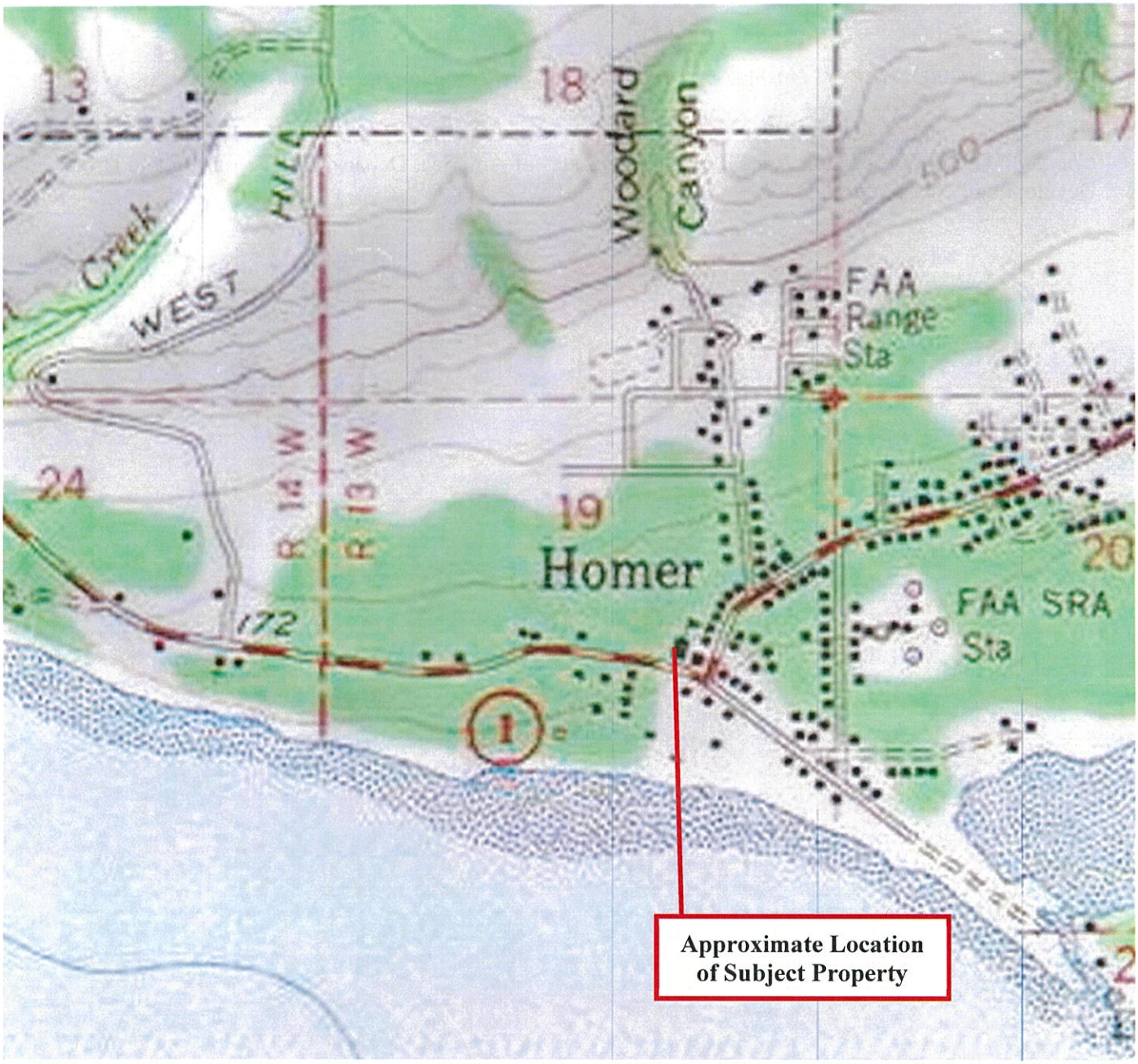
EPA, 2007. *SW-846 Test Method 6200: Field Portable X-Ray Fluorescence Spectrometry for the Determination of Elemental Concentrations in Soil and Sediment.* Environmental Protection Agency, Washington, D.C.

Gough, L.P., Severson, R.C., and Shacklette, H.T. 1988. *Element Concentrations in Soils and Other Surficial Materials of Alaska.* United States Geological Survey Professional Paper 1458, Department of the Interior, Washington, D.C.

HTRW, July 2023. *Hazardous Materials Assessment – HERC Buildings 1 and 2.* Anchorage, Alaska.

HTRW, July 2002. *HERC 1 Hazardous Material Assessment.* Anchorage, Alaska.

HUD, 2009. *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, Chapter 7: Lead-Based Paint Inspection.* United States of America, Department of Housing and Urban Development, Washington, D.C.



Source: Google Earth Pro ©

0 0.25 0.5 1

Approximate Scale in Miles

Homer HERC Buildings
Homer, Alaska
Property Vicinity Map

BGES, INC.	**November 2025**	**Figure 1**

Source: Google Earth Pro ©

0 50 100 200

Approximate Scale in Feet

N

Homer HERC Buildings
Homer, Alaska
Site Map

BGES, INC.	**November 2025**	**Figure 2**