

# STATE OF ALASKA

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## DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

ADEC File: 2538.38.005

March 4, 2008

Larry Bamberger  
AT&T Operations Manager, EH&SS  
3530 Woodward Avenue  
Seaford, NT 11783

Re: AT&T Alascom Cold Bay Earth Station, ADEC Spill #1990250129701  
Conditional Closure Decision

Dear Mr. Bamberger:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), reviewed the administrative file for the diesel fuel release, assessment, and cleanup actions conducted at the AT&T Alascom Cold Bay Earth Station. Based on this review, ADEC has determined that the sub-surface petroleum contamination remaining near the fuel transfer line connection from the 3,000 gallon emergency generator fuel tank to the emergency generator, does not pose an unacceptable risk to human health or the environment, subject to site specific conditions which are outlined in this decision document.

Therefore, it is ADEC's decision that no further remedial action is required at this site and a conditional closure determination is approved. This letter summarizes the information considered in making this decision regarding the environmental status of this site.

### **Introduction**

#### Site name and location:

AT&T Alascom Cold Bay Earth Station  
Cold Bay, Alaska

#### Regulatory authority under which the site is being cleaned up:

This project was reviewed under the applicable regulatory authority in 18 AAC 75, Article 3, as amended through October 16, 2005.

#### Name and mailing address of current contact and/or responsible person:

Larry Bamberger, AT&T Operations Manager, EH&SS  
3530 Woodward Avenue  
Seaford, NY 11783

Land Owner:  
AT&T Alascom

### **Background**

Remediation of diesel fuel impacted soils began at the Cold Bay Earth Station site on August 22, 2005 in accordance with the ADEC approved *Cleanup Plan and Remedial Construction Plan*. The purpose of this work was the remediation of soils impacted by diesel range organics (DRO) in two locations in Area of Interest E (AOI-E) as described in the 1997 Woodward Clyde Consultants *Phase II Site Investigation Report*. The first was a small area identified as "E-TP-1" where stained soils were identified near the door of the emergency generator. The second area, identified as "E-TP-3" was identified as an area of stained soil near the fuel transfer line connection from the 3,000 gallon emergency generator fuel tank to the emergency generator. Groundwater was not encountered during assessment or excavation at this facility.

Since publication of the *Phase 2 Site Investigation Report (1997)*, the emergency generator tank has been replaced with a new tank with a different and larger footprint in a different location. This allowed excavation in the "E-TP-3" spill area. The new tank, however, is located near the door to the emergency generator building potentially impinging on the area represented by the WCC sample. Soils were excavated at the approximate location of WCC test pit "E-TP-1". The excavation was approximately 20 square feet in size and two feet deep. Two samples were collected from the base of the excavation and analyzed for DRO. Neither sample exceeded ADEC Method 2 criteria. The excavated soils were placed in the onsite soil treatment cell (biocell).

Impacted soils from the "E-TP-3" area were excavated to the extent practicable. The presence of the emergency generator building and the limits of the excavator reach limited the extent of the excavation. ADEC Method 2 criteria were met on all sides of the excavation. An area of approximately 6 square feet remains in the center of the bottom of the excavation (approximately 10 feet deep) exceeding the ADEC Method 2 criteria for DRO (443 mg/kg – 2240 mg/kg). Approximately 110 cubic yards of diesel impacted soils were excavated for onsite treatment.

An engineered biocell was constructed adjacent to the Marine Transmitter building as described in the Remedial Construction Plan. Appropriate levels of nutrients (nitrogen and phosphorous) were added to the soils as they were placed in the biocell. The biocell cover was placed as designed, and the mechanical blower operation began on August 26, 2005. The biocell was operated by running the blowers twice per day for two hours during the warmer months of the year, roughly May through October. ADEC approval to decommission the biocell and landspread the treated soil on site was issued on December 10, 2007.

### **Contaminants of Concern**

The contaminants of concern remaining in soil are associated with diesel fuel and include:

- Diesel range organics (DRO)

### **Pathway Evaluation**

The human exposure pathways evaluated include: inhalation, ingestion of soil and water and dermal contact. The migration pathways considered include: migration to groundwater and/or surface water. Impacts to ecological receptors were also evaluated.

The exposure pathways to humans are currently limited because the contaminated soil is subsurface beneath a building and inaccessible. Response actions have reduced the contaminant levels so that they do not pose a hazard to human health or the environment. As long as the building remains in place and the soil is not accessible to humans, there is no unacceptable risk to human health and the environment. Groundwater was not encountered during assessment or excavation work at this facility. With one area of exception, the contaminated soil exceeding ADEC cleanup criteria has been removed. There are no wells on site and the groundwater is not used as a drinking water source in the adjacent undeveloped area. Therefore there is no completed human exposure pathway to groundwater.

Groundwater is not believed to have been contaminated. There was no indication of any impacts to surface water (or ecological receptors) from this incident.

The above exposure pathway analysis was supported by the most recent ADEC Exposure Tracking Model (ETM) ranking. The ETM results showed all pathways to be one of the following: De Minimus Exposure, Exposure Controlled, or Pathway Incomplete.

#### **Cleanup Levels**

The soil cleanup levels established for this site are the 18 AAC 75.341 (Tables B1 and B2) levels for Migration to Groundwater (under 40 inch zone). The groundwater cleanup levels for this site are the 18 AAC 75.345 (Table C) levels.

#### **ADEC Decision**

ADEC has determined that additional remediation of the diesel fuel release is not necessary at this time. The residual soil contamination is not accessible to human receptors based on its location and present land use.

There is residual soil contamination remaining at this site. However, with appropriate controls and restrictions, it should not pose an unacceptable risk to human health or the environment. Therefore, no further response action is required at this time and this site is approved for conditional closure, subject to the following condition:

1. The soil contamination located under the communications building and the emergency generator building is currently inaccessible due to the buildings and structures located there. When (or if) the buildings are removed and/or the soil becomes accessible, ADEC shall be contacted and additional soil cleanup may be required at that time. ADEC must approve any excavation, transport, remediation and/or disposal of soil from the site.

In accordance with 18 AAC 75.380(d)(2), ADEC may require additional site assessment, monitoring, remediation, and/or other necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

An institutional control will be established on the ADEC database to document residual soil contamination remaining on site above the most stringent 18 AAC 75.341 soil cleanup levels. Site closure (without conditions) will be considered when soil samples confirm that the soil

meets the established ADEC soil cleanup levels for this site.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 - 18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. Informal review requests must be delivered to the Division Director, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 15 days after receiving the department's decision reviewable under this section. Adjudicatory hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days after the date of issuance of this letter, or within 30 days after the department issues a final decision under 18 AAC 15.185. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have questions or concerns about this Conditional Closure Decision, or the attached condition, please contact me at (907) 262-5210, extension #233.

Sincerely,



Don Seagren  
Environmental Program Specialist  
Department of Environmental Conservation

CC: Alex Tula, Alta Geosciences, Inc.

AT&T Cold Bay ES CClosure\_3-3-08