

STATE OF ALASKA

FRANK H. MURKOWSKI, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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October 28, 2003

2407, 38,003

John Aniello
PacifiCorp Environmental Remediation Company
825 NE Multnomah Blvd, 2013 LCM
Portland, OR 97232

Subject: ***Environmental Status***
AT&T Alascom Bethel Earth Station
Bethel, Alaska

Dear Mr. Aniello:

The Department of Environmental Conservation, Contaminated Sites Program (ADEC), reviewed the October 2003 Final Investigation Report prepared for the AT&T Alascom Bethel Earth Station. Based on the information provided in that report, there is no evidence to indicate that hazardous substance contamination is present that would pose a risk to human health or the environment. Therefore, ADEC has determined that no further remedial action is required at this site.

The following information is a summary of site assessment events and any conditions that the property is subject to as a result of this determination:

Site History

The Bethel Earth Station was constructed in the 1940's and used as part of the US Army's Alaska Communication System. There were living quarters and communication facilities located on the property. The facility had an above ground fuel tank (partially buried) that provided fuel for heating purposes. It was replaced (by another above ground tank) in the 1980's after a reported hole began leaking fuel. There was minimal information regarding the nature and extent of contamination caused by the leaking tank until the site was investigated in 1997. A December 1997 report by Woodward Clyde Consultants identified elevated (6,300 mg/kg) levels of diesel range organics (DRO) in the vicinity of the old tank but there is no evidence that contaminated soil was ever removed from the site. A follow-up investigation by PacifiCorp in June 2002 further documented the nature and extent of contamination.

There is no on site drinking water wells or septic systems. Water is provided by the city utility and waste water is contained in holding tanks.

Contaminants of Concern

The contaminant of concern identified at this site is DRO.

Conceptual Site Model

The site is used as a residence and commercial operation for communication purposes. The possible pathways of concern that were considered are: ingestion; inhalation and migration to ground and/or surface water. The site investigation identified a permafrost layer that restricted vertical migration to groundwater. In addition, the drinking water aquifer for Bethel is several hundred feet below ground surface. The subject property does not have a drinking water well and is serviced by the local public utility that delivers water to holding tanks. There are no surface water bodies on site that might be impacted by the contamination.

Therefore, the pathways of concern to consider are ingestion and inhalation by human receptors. The highest DRO level identified on site was 6,300 mg/kg DRO in 1997 and 597 mg/kg DRO in 2002. These levels are below the ingestion level of 10,250 mg/kg DRO and the inhalation level of 12,500 mg/kg DRO.

Cleanup Levels

The 18 AAC 75.341 Method Two soil cleanup levels for DRO in the Bethel area are: migration to groundwater is 250 mg/kg; 10,250 mg/kg for ingestion and 12,500 mg/kg for inhalation.

Discussion of Issues

The site investigation identified minor soil contamination impacted by the leaking fuel tank. It appears to be limited vertically by a permafrost layer approximately 3 feet below ground surface and, therefore, the migration to groundwater pathway is not considered complete. The site investigation identified soil contamination above the 250 mg/kg DRO established under 18 AAC 75.341 Table B2 for the migration to groundwater pathway. Even though that pathway is not considered complete, it is still used as a screening level to determine possible risks. The 1997 investigation identified soil impacts as high as 6,300 mg/kg DRO but there was only one sample (597 mg/kg DRO) out of six that exceeded the 250 mg/kg DRO level in 2002. There were no samples that ever exceeded the ingestion or inhalation levels for this area.

ADEC Decision

ADEC has determined that no further remedial action is required at this site. This decision is based on the information presented in the 1997 and 2003 assessment reports and on an evaluation of the potential pathways by which the contamination might migrate at the site. The pathways of concern are ingestion and inhalation with DRO cleanup levels of 10,250 mg/kg and 12,500 mg/kg respectively. Since the highest DRO level identified in 1997 was 6,300 and in 2002 was 597 mg/kg, the site does not pose a risk to human health or the environment and requires no further cleanup action. This decision is conditional on the following:

1. If future information indicates that contamination is present at levels that may pose a risk to human health or the environment, then additional investigative and/or cleanup action may be required.
2. The transport of soil or groundwater from this site requires prior ADEC approval in accordance with 18 AAC 75.325(i).

3. The site will be listed on the ADEC database as requiring no further remedial action. However, due to the nature and extent of contamination remaining on site, even though it does not currently pose a risk to human health or the environment, it will be identified to inform any future owners/operators of the environmental status of the property so they are aware of environmental and/or safety requirements.

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. 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.

Sincerely,



Jim Frechione
Environmental Manager

