

STATE OF ALASKA

SARAH PALIN, GOVERNOR

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

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December 19, 2008

Via Regular and Electronic Mail

Mr. Larry Bamberger
AT&T Alascom Inc.
3530 Woodward
Seaford, NY, 11743-2447

Re: Record of Decision - Cleanup Complete
AT&T Alascom Ketchikan Toll Center
Hazard ID# 3136

The Alaska Department of Environmental Conservation (ADEC) has reviewed environmental assessment data on the AT&T Alascom facility on Lot 5 in the 2900 block of Tongass Avenue in Ketchikan, Alaska. Based on the information currently available, the ADEC has determined that hazardous substance contamination remains on site but it does not pose an unacceptable risk to human health or the environment. As a result of this determination, the site shall be closed in accordance with the terms and conditions outlined in this letter.

Please note the following information was evaluated in determining the environmental status of the facility.

Site Background and Investigation History

The Ketchikan Toll Center facility consists of a large communications tower, an operations building, a generator building, a shop, aboveground storage tanks (ASTs), and formerly, regulated and unregulated underground storage tanks (USTs). The site is a former U.S. Army and U.S. Air Force radio relay station now owned and operated by AT&T Alascom Inc.

ADEC Underground Storage Tank (UST) Program registered a 500gallon gasoline UST located east of the shop that was closed by removal in 1991. Tank closure Site Assessment field screening found no soil contamination but dispenser and piping appurtenances were not identified or assessed during the tank closure. At the request of ADEC, the data gap was later resolved by AT&T Alascom.

In January 1999, a U.S. Environmental Protection Agency (EPA) Superfund Technical Assessment and Response Team (START) performed an environmental site investigation at the facility. Based on contaminated material identified by the START team environmental data, in 2001 a site was opened on the ADEC Contaminated Sites Database.

In 1989, a 500 gallon oil spill was reported from the 6000gallon aboveground fuel storage tank (AST) supplying diesel fuel for the operations building furnace. The spill exceeded the capacity of the unlined containment dike and an estimated 500 gallons of diesel flowed over asphalt to a storm drain that discharges into Marconi Creek. In a 2004 site investigation, ENSR collected surface and shallow subsurface soil samples in the vicinity of the Shop Building and the 6,000gallon AST. Evaluation of subsurface water as a transport mechanism of petroleum contamination was completed by sampling and analysis of surface water drainages.

Three areas of concern (AOCs) were investigated by ENSR for the 2004 Site Assessment Report. The Abandoned UST and Drums in the wooded area downhill of the parking lot, the Buried UST adjacent to the Operations Building, and the AST (designated Tank No. 2) spill zone between the Shop and the Generator Buildings.

Abandoned UST and Drum Area

Following removal of the empty drums and former UST for off-site disposal, confirmation samples of residual soil were collected and analyzed. Concentrations of benzene, toluene, ethyl benzene, and xylene (BTEX) compounds, diesel range hydrocarbons (DRO) and residual range hydrocarbons (RRO) detected in soil in this area of the property were below ADEC Method Two, Table B2, risk-based soil cleanup levels. Benzo-a-pyrene, a polycyclic aromatic hydrocarbon (PAH) was detected in the soil sample at 3.29 mg/kg, a concentration that exceeds the applicable Method Two Table B1 soil cleanup level of 2.4 mg/kg.

Buried UST Area

In 2003, an out-of-service 500gallon UST was removed from the north side of the operations building. Petroleum contaminated material was excavated to the extent feasible then a confirmation sample of residual soil was collected near a french drain along the building foundation. Analysis found DRO in soil concentrations ranging from 634 to 2,260 mg/kg, negligible BTEX compounds and benzo-a-pyrene ranging from 1.99 to 4.04 mg/kg. Follow up subsurface sampling was performed in several locations near the UST cleanup site for the ENSR 2004 report. DRO and RRO concentrations in soil samples were detected in concentrations below Method Two migration to ground water soil screening level. Although the soil was not analyzed for PAHs, assessment for these compounds was completed on surficial drainage water sampling.

Tank No. 2 AST Area

Tank No. 2 is the 6,000 gallon heating oil AST located between the shop and generator buildings. Samples of surface and subsurface soil were collected to assess the extent of impacts left from the 1989 spill. Samples had concentrations of DRO in soil ranging from 1,020 mg/kg to 5,340 mg/kg.

In response to the 2004 ENSR Report, ADEC suggested that AT&T Alascom draft conceptual site model to identify areas of contamination, exposure pathways and receptors on-site and off-site. Uncertainty remained whether surficial drainages and intermittent groundwater were completed pathways for off-site migration from the residual petroleum source areas.

Site Cleanup

In 2005, the facility bulk fuel systems were replaced and necessary cleanup field work was completed. The 6,000-gallon and 750-gallon ASTs were drained, cut up and scrapped off-site;

petroleum contaminated material beneath the tanks was excavated, shipped off-site and remediated. Additional investigative sampling of residual soil was performed at the Abandoned UST/Drum site cleanup and water drainages were examined and sampled for analysis.

ADEC received the 2005 Cleanup Report for review in 2008. Evaluation found that during the 6,000gallon AST cleanup in 2005, a buried utility corridor between the Shop and Operations Buildings blocked access to contaminated soil. Confirmation samples of residual soil detected DRO concentrations ranging from 819 to 9,780 mg/kg in the southern wall of the excavation. Structures also limited access to contaminated material at the 750gallon AST cleanup. Confirmation samples of residual soil had DRO petroleum fraction concentrations ranging from 449 to 3,650 mg/kg; BTEX compounds were not detected.

Additional assessment at the abandoned UST and drum storage area on the vegetated slope below the driveway determined that DRO and RRO petroleum fractions were detectable in soil at concentrations below Method Two migration to groundwater cleanup levels.

Surface water drainages and a ground water seep were sampled and analyzed for petroleum impact methods to meet 18 AAC 70 Water Quality Standards. While no impacts were detected in the water samples, the ENSR 2005 conceptual model of the contaminant source areas, receptors and the exposure pathways identified that these runoff drainages intermittently enter Marconi Creek at the base of the property near Tongass Avenue. Provisions were added to the facility Spill Prevention, Control and Countermeasures Plan (SPCC) to record periodic observations of the drainages on the property for petroleum impacts from the residual subsurface contaminated soil areas, particularly during rainfall storm events.

Remaining On-Site Soil Contamination

Residual soil under the utility corridor at the 6,000gallon AST has DRO compounds in concentrations above Method Two Table B2 health-based soil screening levels. Residual soil at the 750gallon AST has DRO concentrations above applicable migration to ground water Method Two soil screening levels. In each of these instances, the quantity of soil over bedrock is limited and unlikely to produce a measurable impact to subsurface or surface water.

Surface and Subsurface Waters

Subsurface water over bedrock beneath the property is intermittent and unlikely to meet the regulatory definition of ground water under 18 AAC 75.990 and referenced in 18 AAC 78.995. Ground water influenced by transiting the property is not within a zone of contribution to or recharge of an active or public drinking water system. It should be noted that ground water generally does not serve as a drinking water source in the Ketchikan area and is not a reasonably expected future source of drinking water in the vicinity of this property. Ketchikan Public Utilities supplies drinking water to this and all adjacent properties.

Contaminants of Concern

Diesel range petroleum fraction hydrocarbons (DRO), polycyclic aromatic hydrocarbon compounds (PAHs) benzo-a-pyrene, benzene, toluene, ethylbenzene, and total xylene (BTEX) compounds

Cleanup Criteria

The soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2. The ground water cleanup levels for this site are established in 18 AAC 75.345 Table C.

Pathway Evaluation

The exposure pathways for human health that were evaluated include ingestion of soil and ground water, indoor and outdoor inhalation of vapors and dermal contact with soil. However, since the soil contamination remaining on site is located below ground surface and ground water is not accessible there is no unacceptable risk posed to human health, or the environment. The exposure pathway evaluation is supported by the ADEC Exposure Tracking Module (ETM) results. All pathways for exposure to residual contaminants at this site are limited in volume (de minimis), controlled or incomplete.

ADEC Decision

The investigation and cleanup of petroleum contamination on the referenced property has met all requirements specified in 18 Alaska Administrative Code (AAC) 75 Article 3 - Discharge, Reporting, Cleanup, and Disposal of Oil and Other Hazardous Substances and 18 AAC 78, Underground Storage Tanks. Based on the information provided by your consultant regarding the quantity and accessibility of the remaining contaminated material, ground water use at the site and in the area, and human health and ecological risks, the ADEC has determined that no further assessment or cleanup action is required.

In accordance with 18 AAC 75.380(d)(1) and 18 AAC 78.276, additional investigation and cleanup may be required if new information is discovered which leads the ADEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

Appeal

Persons who disagree with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195- 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 of the permit 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 of this decision letter. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have questions regarding this letter or concerns please contact me by telephone at 907-465-5210 or email at Bruce_Wanstall@dec.state.ak.us .



Bruce Wanstall
Project Manager
State and Private Cleanup Program

cc: Chris Humphrey, PE, ENSR Inc