THE STATE
of ALASKA
GOVERNOR SEAN PARNELL

Department of
Environmental Conservation

DIVISION OF SPILL PREVENTION & RESPONSE
Contaminated Sites Program

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File No: 2258.26.011

January 21, 2014

AT&T Alascom, Inc.
Attn: Temeka Jackson, Manager, Environment, Health, and Safety
308 South Akard Street Room 1700
Dallas, TX 75202-5315

Re: Decision Document: AT&T Alascom Bartlett Earth Station Tank #4
Corrective Action Complete Determination

Dear Ms. Jackson,

The Alaska Department of Environmental Conservation (ADEC) has reviewed the environmental records for the AT&T Alascom Bartlett Earth Station Tank #4 site, located in Anchorage, Alaska. This decision letter memorializes the site history, cleanup actions, and standard conditions for long-term site management. No further remedial action is required.

**Site Name and Location:**
AT&T Alascom Bartlett Earth
Station Tank #4
21518 Comsat Road
Talkeetna, AK 99676

**Name and Mailing Address of Contact Party:**
AT&T Alascom, Inc.
Attn: Temeka Jackson
308 South Akard Street Room 1700
Dallas, TX 75202-5315

**DEC Site Identifiers:**
File No: 2258.26.011
Hazard ID: 25577

**Regulatory Authority for Determination:**
18 AAC 75 and 18 AAC 78

## Site Description, Background, and Cleanup Activities

A 10,000-gallon fiberglass underground storage tank (UST), utilized for the storage of diesel fuel, was removed from the Talkeetna Earth Station and Microwave Repeater site on June 27, 2013. During the UST removal activities, the excavated soils were field screened with a photoionization detector (PID) for volatile organic constituents (VOCs) and temporarily stockpiled on site. After the UST was removed from the ground it was hauled offsite for disposal. A total of 9 confirmation soil samples (4 from the base of the excavation and beneath the tank, 1 from beneath the piping, and 4 from the stockpiled soils), and a duplicate soil sample (from beneath the tank), were submitted for laboratory analysis. The confirmation soil samples were analyzed by TestAmerica for gasoline range organics (GRO), diesel range organics (DRO), residual range organics (RRO), and benzene, toluene, ethylbenzene, and total xylenes (BTEX). One soil sample, collected from the soil stockpile, was also analyzed for polynuclear aromatic hydrocarbons (PAHs). Concentrations of RRO and Several PAHs were present in the soil samples; however, at concentrations well below the approved cleanup levels.

## Contaminants of Concern

Several contaminants were detected during laboratory analysis of the confirmation soil samples; as listed below:

- RRO
- Chrysene
- Pyrene
- Benzo(a)anthracene
- Phenanthrene
- Benzo(a)pyrene
- Benzo(ghi)perylene
- Indeno(1,2,3-cd)pyrene
- Benzo(k)fluoranthene
- Benzo(b)fluoranthene

## Cleanup Levels

All of the analytes were detected in soil below the most stringent Method 2 cleanup levels for the under 40-inch precipitation zone, established in 18 AAC 75.341(c)(d), Tables B1 and B2.

**Table 1 – Approved Cleanup Levels**

| Contaminant | Most Stringent Cleanup Levels (mg/kg) | Maximum Concentrations of Analytes Remaining Onsite (mg/kg) |
|---|---|---|
| RRO | 10,000 | 57.7 |
| Chrysene | 360 | 0.0312 |
| Pyrene | 1,000 | 0.0527 |
| Benzo(a)anthracene | 3.6 | 0.0277 |
| Phenanthrene | 3,000 | 0.0402 |
| Benzo(a)pyrene | 0.49 | 0.0271 |
| Benzo(ghi)perylene | 1,400 | 0.0222 |
| Indeno(1,2,3-cd)pyrene | 4.9 | 0.0187 |
| Benzo(k)fluoranthene | 49 | 0.0215 |
| Benzo(b)fluoranthene | 4.9 | 0.0409 |

**mg/kg = milligrams per kilogram**

## Cumulative Risk Evaluation

Pursuant to 18 AAC 78.600(d), when detectable contamination remains on-site following a cleanup, a cumulative risk determination must be made that the risk from hazardous substances does not exceed a cumulative carcinogenic risk standard of 1 in 100,000 across all exposure pathways and

does not exceed a cumulative noncarcinogenic risk standard at a hazard index of one across all exposure pathways.

Based on a review of the environmental record, ADEC has determined that residual contaminant concentrations do not pose a cumulative human health risk.

**Exposure Pathway Evaluation**

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using ADEC's Exposure Tracking Model (ETM). Exposure pathways are the conduits by which contamination may reach human or ecological receptors. ETM results show all pathways to be one of the following: De-Minimis Exposure or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

**Table 2 – Exposure Pathway Evaluation**

| Pathway | Result | Explanation |
|---|---|---|
| Surface Soil Contact | Pathway Incomplete | Contamination is not present in surface soil (0 to 2 feet below ground surface). |
| Sub-Surface Soil Contact | De-Minimis Exposure | Contamination remains in the sub-surface, but is below the most stringent cleanup levels. |
| Inhalation – Outdoor Air | Pathway Incomplete | Volatile compounds were not detected in any of the confirmation soil samples. |
| Inhalation – Indoor Air (vapor intrusion) | Pathway Incomplete | Volatile compounds were not detected in any of the confirmation soil samples. |
| Groundwater Ingestion | Pathway Incomplete | Groundwater contamination is not present. |
| Surface Water Ingestion | Pathway Incomplete | Surface water is not contaminated and is not used as a drinking water source in the vicinity of the site. |
| Wild and Farmed Foods Ingestion | De-Minimis Exposure | Contaminants of concern were not present at concentrations that exceeded the most stringent cleanup levels. |
| Exposure to Ecological Receptors | Pathway Incomplete | Site is not in an area that would affect aquatic or terrestrial life. |

**Notes to Table 2:** "De-Minimis Exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal volume or concentration of remaining contamination. "Pathway Incomplete" means that in ADEC's judgment contamination has no potential to contact receptors.

**ADEC Decision**

Remaining petroleum contamination in soil is below approved cleanup levels. This site will receive a "Closed" designation on the Contaminated Sites Database, subject to the following standard conditions.

**Standard Conditions**

1. Any proposal to transport soil or groundwater off-site requires ADEC approval in accordance with 18 AAC 78.600(h). A "site" [as defined by 18 AAC 75.990 (115)] means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

2. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited.

3. Groundwater in the state of Alaska is protected for aquaculture use. In the event that an aquaculture facility uses groundwater from this site in the future, additional testing may be required to ensure that aquatic life criteria under 18 AAC 70 are not exceeded

This determination is in accordance with 18 AAC 78.276(f) and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that this site may pose an unacceptable risk to human health or the environment.

**Appeal**

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 about this closure decision, please feel free to contact me at (907) 269-7691.

Sincerely,

Joshua Barsis
Environmental Program Specialist III