

STATE OF ALASKA

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

SEAN PARNELL, GOVERNOR

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File: 2569.38.007
Certified Return Receipt
Article No: 7008 1830 0002 6349 4043

February 9, 2010

Lawrence Bamberger
AT&T
1444 East Jericho Turnpike
Huntington, NY 11743

Re: Decision Document; AT&T Alascom King Salmon Earth Station
Cleanup Complete- Institutional Controls

Dear Mr. Bamberger:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, has completed a review of the environmental records associated with the AT&T Alascom King Salmon Earth Station. Based on the information provided to date, the ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and no further remedial action will be required as long as the site is in compliance with established institutional controls.

This decision is based on the administrative record for the AT&T Alascom King Salmon Earth Station, which is located in the offices of the ADEC in Anchorage, Alaska. This letter summarizes the decision process used to determine the environmental status of this site and provides a summary of the regulatory issues considered in the Cleanup Complete with Institutional Controls Determination.

Introduction

Site Name and Location:

AT&T Alascom King Salmon Earth Station
Airport Road; Lot 5, Lot 6, and Lot 7
King Salmon Airport, Alaska 99613

Name and Mailing Address of Contact Party:

Larry Bamberger
AT&T
1444 East Jericho Turnpike
Huntington, NY 11743

ADEC Site Identifiers:

ADEC Reckey: 1997250116701

File: # 2569.38.007

Hazard ID: 2819

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

In 1997, petroleum impacted soil was encountered at two source areas located adjacent to the King Salmon Airport - reportedly as a result of piping leaks. The former garage above ground storage tank (AST) source area is located on Lot 7. The other source area was the 3,000 gallon powerhouse AST which is located on Lot 5. Sometime between 1997 and 2005, the 3,000 gallon AST on Lot 5 was replaced by a new AST. In 2009, both the AST and the garage building on Lot 7 were removed.

Contaminants of Concern

During the investigation at this site, soil samples were analyzed for the following: diesel range organics (DRO); gasoline range organics (GRO); residual range organics (RRO); metals; polychlorinated biphenyls (PCBs); and volatile organic compounds (VOCs) including benzene, toluene, ethylbenzene, and xylenes (BTEX). Based on these analyses and knowledge of the source area, the following Contaminant of Concern was identified:

- Diesel Range Organics (DRO)

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, *Under 40 Inch Zone*.

<u>Contaminant</u>	<u>Migration to Groundwater Cleanup Level (mg/kg)</u>
Diesel range organics (DRO)	250

Site Characterization and Cleanup Actions

During a 1997 site investigation, samples were collected from both Lot 5 and Lot 7 source areas. Two soil samples that were collected 8 feet below ground surface (bgs) at the 3,000 gallon powerhouse AST (Lot 5) contained DRO up to 2,600 mg/kg. At the former garage AST (Lot 7), four soil samples collected at 4 feet bgs and 8 feet bgs contained DRO up to 11,000 mg/kg and 2,200 mg/kg respectively. A water sample collected from the potable well at the Communications Building on Lot 7 did not contain detectable concentrations of contaminants. This drinking water well is completed at a depth of 145 feet bgs in the deepest of three known aquifers in this area, and is protected by two aquitards present in the strata above the bottom of the well.

In 2005, sixty cubic yards of contaminated soil were excavated from the former garage AST area (Lot 7) and placed in a biocell. The former garage AST excavation was limited by the presence of the garage building, a heating oil tank, and a paved road. Confirmation samples collected at 8.5 ft. bgs contained DRO up to 2,930 mg/kg. No soils were excavated from the 3,000 gallon powerhouse AST area located on Lot 5 due to the presence of a new AST,

overhead lines, the powerhouse building, and the Communications Building drinking water well. Two soil samples collected at the 3,000 gallon powerhouse AST at 2 feet bgs, did not contain detectable concentrations of contaminants.

In 2008, four soil samples collected from the biocell contained DRO ranging from 251 to 475 mg/kg. Approval was given by ADEC to landspread the biocell soil on lot 6, between the Communications Building and the former garage.

In 2009, the biocell was decommissioned and a site investigation was performed at the former garage AST area to evaluate the presence of contaminants in groundwater and to see if soil contamination was present beneath the garage building. Three monitoring wells advanced around the former garage, encountered groundwater at 16 to 20 feet bgs flowing west to southwest. Three groundwater samples and three soil samples collected at the groundwater interface did not contain detectable concentrations of contaminants. Once the garage building and concrete pad were demolished, three soil borings were advanced and a total of nine samples were collected. Three samples were collected from each boring at the depths of 3 feet, 6 feet, and 8 feet bgs. The soil samples contained detectable concentrations of DRO, but results were below ADEC cleanup levels with the exception of one sample. This soil sample was collected at 3 feet bgs and contained DRO at 629 mg/kg.

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, Exposure Controlled, or Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Pathway	Result	Explanation
Surface Soil Contact	De Minimis Exposure	The removal action served to remove the majority of contaminated soil, and any remaining contaminant concentrations are well below direct contact cleanup levels.
Sub-Surface Soil Contact	De Minimis Exposure	The removal action served to remove the majority of contaminated soil, and any remaining contaminant concentrations in the subsurface are well below direct contact cleanup levels.
Inhalation -- Outdoor Air	Pathway Incomplete	The remaining soil contaminant concentrations are well below inhalation cleanup levels for DRO, and no other volatile compounds are present. Therefore this pathway is considered incomplete.
Inhalation -- Indoor Air (vapor intrusion)	Pathway Incomplete	The remaining soil contaminant concentrations are well below inhalation cleanup levels for DRO, and no other volatile compounds are present. Therefore this pathway is considered incomplete.

Groundwater Ingestion	Pathway Incomplete	Groundwater samples collected from three temporary wells at Lot 5 and from the potable well at Lot 7 did not contain detectable concentrations of contaminants
Surface Water Ingestion	Pathway Incomplete	Source areas are located more than 100 feet from surface water. Therefore the pathway for water runoff is considered incomplete.
Wild Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals. This area is not used for harvesting wild foods.
Exposure to Ecological Receptors	Pathway Incomplete	There are no complete exposure pathways to ecological receptors at this site.

Notes to Table 1: "De minimis exposure" means that in ADEC's judgment receptors are unlikely to be affected by the minimal volume of remaining contamination. "Pathway incomplete" means that in ADEC's judgment contamination has no potential to contact receptors. "Exposure controlled" means there is an administrative mechanism in place limiting land or groundwater use, or a physical barrier in place that deters contact with residual contamination.

ADEC Decision

There is contamination remaining above established cleanup levels at the AT&T Alascom King Salmon Earth Station, but ADEC has determined there is no unacceptable risk to human health or the environment, and this site will be granted a Cleanup Complete- Institutional Controls Determination subject to the following:

1. Any future change in land use may impact the exposure assumptions cited in this document. If land use and/or ownership changes, current institutional controls may not be protective and ADEC may require additional remediation and/or institutional controls. Therefore, AT&T will report to ADEC every five years to document land use, or as soon as the AT&T becomes aware of any change in land ownership and/or use.
The report can be sent to the local ADEC office or electronically to DEC.ICUnit@alaska.gov
2. A Notice of Residual Contamination will be recorded on the ADEC database to document that there is contamination remaining on site above the most stringent ADEC cleanup levels.
3. Any proposal to transport soil or groundwater off site requires ADEC approval in accordance with 18 AAC 75.325(i). 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. (see Attachment B).
4. The soil contamination located under the powerhouse AST is currently inaccessible (see attachment B). When the powerhouse AST is removed and/or the soil becomes

accessible, the soil must be evaluated and contamination addressed in accordance with an ADEC approved work plan.

5. ADEC recommends periodically monitoring the Communications Building drinking water well for petroleum constituents.
6. Movement or use of potentially contaminated soil in a manner that results in a violation of 18 AAC 70 water quality standards is unlawful.

This determination is in accordance with 18 AAC 75.380(d) 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 contact Bill O'Connell at (907) 269-3057.

Sincerely,



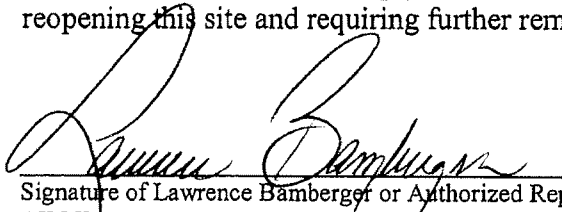
Linda Nuechterlein
Environmental Manager

CC: Mick Luce, Iberdrola Renewables Holdings, Inc.
Jim Thorsness, ADOT&PF

Attachment A: Cleanup Complete-ICs Agreement Signature Page
Attachment B: Site Figure

Attachment A: Cleanup Complete-ICs Agreement and Signature Page*

AT&T agrees to the terms of this Corrective Action Complete determination as stated in this Closure Decision Document dated **February 9, 2010** for the AT&T Alascom King Salmon Earth Station. Failure to comply with the terms of this agreement may result in ADEC reopening this site and requiring further remedial action in accordance with 18 AAC 75.380(d).

 2/29/2010
Signature of Lawrence Bamberger or Authorized Representative, Title
AT&T

Lawrence Bamberger
Printed Name of Lawrence Bamberger or Authorized Representative, Title
AT&T

Note to Responsible Person (RP):

After making a copy for your records, please return a signed copy of this form to the ADEC project manager at the address on this correspondence within 30 days of receipt of this letter.

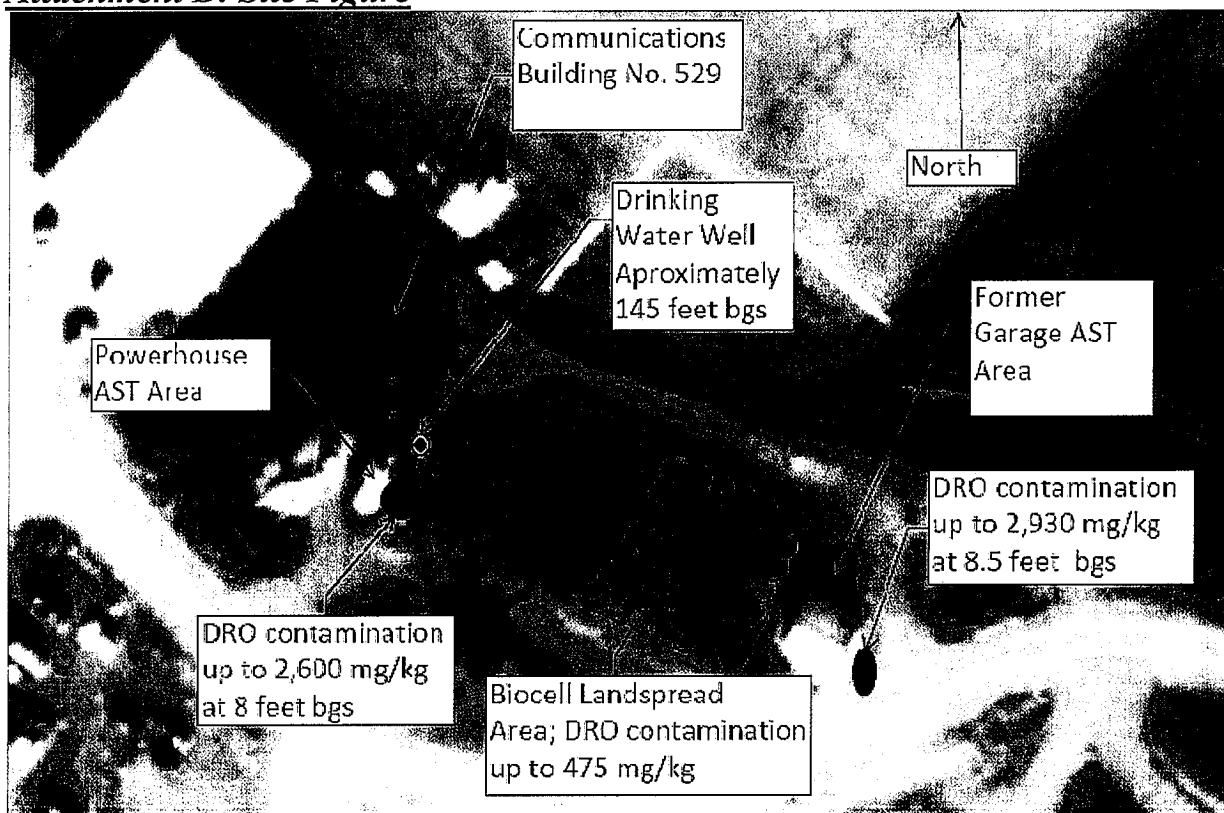
ADEC File:#	2569.38.007
Hazard ID:	2819
ADEC Project Manager:	Grant Lidren

For Internal Use Only

*Attention ADEC Administration Staff: Please follow the procedure below after Attachment A is signed/returned to ADEC.

1. Log-in and Date Stamp *Attachment A*
2. Scan and Save to the appropriate electronic folder on the network Drive
3. File the hard copy in the appropriate project/site file Correspondence Folder (blue in Anchorage).
4. Provide the Correspondence folder (with the filed *Attachment A* hard copy) to the ADEC Project Manager so that the PM can update the CS database.

Attachment B: Site Figure



Google Earth Pro Image 2009