

STATE OF ALASKA

SEAN PARNELL, GOVERNOR

DEPT. OF ENVIRONMENTAL CONSERVATION

DIVISION OF SPILL PREVENTION AND RESPONSE CONTAMINATED SITES PROGRAM

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November 18, 2010

Rhonda Kitchens
AT&T Alascom
200 Gaffney Road
Fairbanks, Alaska 99701

Re: Decision Document; AT&T Alascom Jet Crash Port Heiden Airport
Cleanup Complete Determination

Dear Ms. Kitchens:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the AT&T Alascom Jet Crash at the Port Heiden Airport. Based on the information provided to date, ADEC has determined that the contaminant concentrations remaining on site do not pose an unacceptable risk to human health or the environment, and this site will be closed.

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 Determination.

Introduction

Site Name and Location:

AT&T Alascom Jet Crash Port Heiden Airport
Port Heiden, Alaska

Name and Mailing Address of Contact Party:

Rhonda Kitchens
AT&T Alascom
200 Gaffney Road
Fairbanks, Alaska 99701



Database File Number and Hazard ID Number:

File: 2637.38.004

Hazard ID: 25516

Regulatory authority under which the site is being cleaned up:

18 AAC 75

Background

Approximately 240 gallons of Jet A fuel spilled from an AT&T Jet after it crashed during landing at the Port Heiden Airport in April 2008.

Contaminants of Concern

During the investigations at this site, soil samples were analyzed for DRO, GRO, BTEX, RRO and PAH. Based on these analyses and knowledge of the source area, the following Contaminants of Concern were identified:

- Gasoline Range Organics (GRO)
- Diesel Range Organics (DRO)
- Benzene
- Ethylbenzene

Cleanup Levels

The default soil cleanup levels for this site are established in 18 AAC 75.341, Method Two, Tables B1 and B2, Migration to Groundwater (MTG).

Contaminant	MTG Site Cleanup Level (mg/kg)
GRO	300
DRO	250
Benzene	0.025
Ethylbenzene	6.9

Characterization and Cleanup Activities

During the initial response following the crash, approximately 140 gallons of free product were recovered. Twelve cubic yards of contaminated soil were also excavated during the initial response and stored on site in super sacks.

Confirmation samples collected from the excavation contained ethylbenzene and xylenes at concentrations below the migration to groundwater cleanup levels.

DRO, benzene, toluene and PAHs were not detected in the confirmation samples.

In May 2008 the soil was placed in a treatment cell on an existing concrete pad at the Airport. Pre-treatment samples collected in August 2008 contained GRO at 389 mg/kg; DRO at 3,220 mg/kg; and ethylbenzene at 8.76 mg/kg. Toluene, xylenes and PAHs were detected but were below the migration to groundwater cleanup levels in the pre-treatment samples. RRO and benzene were not detected.

In August 2008 the soil was treated with nutrients and microbes to facilitate remediation. Interim sampling conducted in September 2008 found GRO at 418 mg/kg; DRO at 4,360 mg/kg; and benzene at 0.035 mg/kg, all other analytes were below migration to groundwater cleanup levels. Sampling done in October of 2008 found DRO at 1,700 mg/kg; all other analytes were below ADEC cleanup levels. The soil was treated again and in June 2009 DRO was found up to 253 mg/kg. After final soil treatment in July 2009, confirmation samples were collected in August 2009; and DRO was detected at 18.9 mg/kg.

The soil was approved for reuse at the Port Heiden Airport by ADEC in September 2010.

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.

Table 1 - Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	Contaminated soil was excavated from the surface and treated.
Sub-Surface Soil Contact	De - Minimis Exposure	The sub-surface soil was excavated and confirmation samples indicate the remaining subsurface contamination is well below the most stringent cleanup levels.
Inhalation - Outdoor Air	De-Minimis Exposure	Contaminants remain in soil, but at concentrations well below both MTG and inhalation cleanup levels.
Inhalation - Indoor Air (vapor intrusion)	Pathway Incomplete	There are no buildings near the site; any remaining contamination is non-volatile, and below MTG levels.
Groundwater Ingestion	Pathway Incomplete	Groundwater was not encountered during the investigation or cleanup activities. Remaining contamination is below MTG cleanup levels.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ mile of the site.

Wild Foods Ingestion	Pathway Incomplete	This site is on airport property and is not used as a source for wild foods collection.
Exposure to Ecological Receptors	Pathway Incomplete	The soil has been treated and is below the migration to groundwater levels. There is no exposure to ecological receptors expected.

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

The cleanup actions to date have served to excavate and adequately treat the contaminated soil from the site. Based on the information available, ADEC has determined no further assessment or cleanup action is required. There is no longer a risk to human health or the environment, and this site will be designated as closed on the department's database.

Although a Cleanup Complete Determination has been granted, ADEC approval is required for off-site soil disposal in accordance with 18 AAC 75.380(d). However, since this site has met the most conservative soil cleanup levels, this letter will serve as your approval for future off-site movement and disposal of soil associated with this release. The Alaska Department of Transportation has approved the treated soil for use in its runway maintenance at the Port Heiden Airport. ADEC requires that the treated soil not be placed within 20 feet from the edge of any gravel aprons and not in contact with any surface water bodies. It should be noted that 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 the ADEC project manager, Pam Clemens at (907) 269-7551.

Approved By,

Recommended By



Linda Nuechterlein
Environmental Program Manager



Pam Clemens
Environmental Program Specialist

Cc: George Herr, New Horizons Telecom