THE STATE of ALASKA
GOVERNOR BILL WALKER

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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File No: 630.38.001

June 5, 2015

Robert Johnston
AFCEC/OLAR
10471 20th Street, Suite 343
JBER, AK 99506

Re: Site Closure Documentation for North River Radio Relay Station Site OT001 (WACS)

Dear Mr. Johnston:

The Alaska Department of Environmental Conservation (ADEC) has completed a review of the environmental records associated with the North River Radio Relay Station (RRS) Site OT001 (WACS). Based on this review we are issuing a Cleanup Complete determination for Site OT001. 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
Site OT001 (WACS)
North River Radio Relay Station
North River RRS Access Road, mile 12
Unalakleet, AK 99684

DEC Site Identifiers
File No: 630.38.001
Hazard ID: 845

Regulatory Authority for Determination
18 AAC 75.380

Site Description and Background
The North River RRS is located on 26 acres of land on top of a bluff approximately 12 miles northeast of the village of Unalakleet, Alaska. Site OT001 is at the top of the hill at the end of a gravel access road at latitude 63.888749, longitude -160.518090, and is one of eleven sites receiving remedial action within the North River RRS project area. The facility was constructed in 1957 as one of the thirty-one original White Alice Communication Station (WACS) facilities used for defense and civilian communications and was

compounds were detected below the ADEC Method Two CULs, but PCBs were detected above the CULs in three out of 11 samples to a maximum concentration of 4.7 mg/kg.
2008 – Site Characterization and Remedial Investigation Report (site-wide) completed.
2011 – Approximately 260 cy of PCB-contaminated soil was excavated and disposed off-site, of which 17 cy was characterized as Toxic Substances Control Act (TSCA) regulated hazardous waste and the remaining 243 cy was characterized as TSCA non-hazardous waste.
2012 – Approximately 1,195 cy (1,558 tons) of PCB-contaminated soil was excavated and disposed off-site of which 142 cy (157 tons) was characterized as TSCA hazardous waste, 1,026 cy (1,350 tons) was characterized as TSCA non-hazardous waste, and the remaining 27 cy (51 tons) disposed of as comingled PCB and asbestos contaminated soil.
2013 – Approximately 651 cy of PCB-contaminated soil was excavated, containerized, and stored off-site for later disposal.
2014 – Approximately 11.5 cy of PCB-contaminated soil was excavated, containerized, and stored off-site for later disposal. Confirmation samples from Site OT001 showed all results for PCB were below the ADEC CULs of 1 mg/kg, and the site was backfilled and graded.

Cumulative Risk Evaluation

Pursuant to 18 AAC 75.325(g), 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 non-carcinogenic 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. The highest concentration of PCB detected in the confirmation samples was 0.014, which results in a cumulative cancer risk calculation of 1 in 500,000,000 (0.00000005) and a total hazard index of 0.

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 for the North River RRS Site OT001 show all pathways to be Pathway Incomplete. A summary of this pathway evaluation is included in Table 1.

Table 1 – 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	Pathway Incomplete	Highest detected concentration of PCB remaining in soil is 0.014 mg/kg, which below cleanup levels for ingestion and direct contact.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination detection is subsurface and below ingestion and direct contact cleanup levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Soil vapor is not an issue.

Groundwater Ingestion	Pathway Incomplete	Depth to groundwater is not known at OT001, but is not present up to 15 feet below ground surface.
Surface Water Ingestion	Pathway Incomplete	Surface water is not present.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminated soil above cleanup levels for ingestion has been removed.
Exposure to Ecological Receptors	Pathway Incomplete	All pathways are incomplete; any contamination remaining is below cleanup levels.

Note to Table 1: "Pathway Incomplete" means that in ADEC's judgment contamination has no potential to contact receptors.

ADEC Decision

There has been approximately 2,157 cy of PCB-contaminated soil removed from Site OT001 from 1985 through 2014 and confirmation samples show that the remaining PCB contamination in soil is below approved cleanup levels for ingestion and direct contact. Although depth to groundwater is unknown at Site OT001 it has not been detected to depths of up to 15 feet below ground surface. This site will receive a "Cleanup Complete" 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 75.325. 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 attached site figure.)

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

This determination is in accordance with 18 AAC 75.380 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 99811-1800, 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 99811-1800, 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 any questions regarding this letter, please contact me at (907) 269-7578 or at Meredith.Savage@alaska.gov.

Sincerely,

Meredith Savage
Environmental Program Specialist