

STATE OF ALASKA

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

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File: 120.38.008

July 19, 2007

Larry Bamberger
AT&T Operations Manager, EH&SS
AT&T
3530 Woodward Avenue
Seaford, NT 11783

Re: AT&T Alascom Delta Junction Terminal Station, ADEC Spill #1997330114003
Conditional Closure Approved

Dear Mr. Bamberger:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC), reviewed the administrative file for the diesel fuel release, assessment, and cleanup actions conducted at the AT&T Alascom Delta Junction Terminal Station. Based on this review, ADEC has determined that hazardous substance contamination remains under the Power Building but it does not pose an unacceptable risk to human health or the environment, subject to site specific conditions outlined in this decision document.

Therefore, it is ADEC's decision that no further remedial action is required at this site and a conditional closure determination is approved. This letter summarizes the information considered in making this decision regarding the environmental status of this site.

Introduction

Site name and location:

AT&T Alascom Delta Junction Terminal Station
Delta Junction, Alaska

Regulatory authority under which the site is being cleaned up:

This project was reviewed under the applicable regulatory authority in 18 AAC 75, Article 3, as amended through October 16, 2005.

Name and mailing address of current contact and/or responsible person:

Larry Bamberger
AT&T Operations Manger, EH&SS
3530 Woodward Avenue
Seaford, NY 11783

Land Owner:
AT&T Alascom

Background

The Delta Junction Terminal Station is located in Delta Junction, Alaska at the junction of the Alaska and Richardson Highways. The topography is flat with no defined drainage for the property. The on-site well is 150 feet deep with a water level of 78 feet below the ground surface. The facility has been a communications site since being constructed by the Army Signal Corps in 1952. AT&T Alascom currently owns and operates the communications site.

A Phase I Site Assessment was conducted in 1995 that identified 10 areas of potential contamination. The 1997 Phase II Site Assessment evaluated a total of 10 Areas of Interest (AOI) related to either past activities or operations on the property, or structures which may have contained or received fuels or wastes. With the exceptions of two areas, AOI-C, a former truck fill stand, and AOI-I, a former fuel line to building 2, all the areas have either been shown to meet state and federal cleanup levels, or have been remediated to meet state and federal cleanup levels.

The *Construction Completion Report 2006 Interim Soil Remediation Delta Junction Terminal Station* dated May 2007 investigated the AOI-C - Former Truck Fill Stand, the AOI-I - Former Fuel Lines, and background concentrations of arsenic and chromium. At the AOI-C - Former Truck Fill Stand it was documented that cleanup of this area had previously been successfully completed. No contamination was documented exceeding cleanup levels. At the AOI-I - Former Fuel Lines area former fuel lines were removed and 153.12 tons of petroleum contaminated soil was excavated and transported to OIT in Fairbanks for thermal remediation. A post-excavation side-wall sample adjacent to the Power Building foundation detected soil contamination exceeding the soil cleanup levels. All other confirmation samples showed that soil contamination exceeding cleanup levels had been removed. Further excavation would threaten the structural integrity of the building.

The Phase II assessment detected Arsenic and Chromium levels above cleanup levels. The 2007 report demonstrated that these levels are normal background levels for the area and not the result of any contamination issues.

No groundwater was encountered during any of the site work. As a result no samples were collected. Groundwater is not an issue at this site.

Soil contamination remains under the Power Building that may exceed ADEC cleanup levels. This contamination does not pose an unacceptable risk to human health or the environment. AT&T Alascom will be required to contact ADEC if the contaminated area becomes accessible. ADEC will determine at that time the appropriate actions required to assess &/or cleanup this remaining contaminated soil.

Contaminants of Concern

The contaminants of concern remaining in soil are associated with diesel fuel and include:

- Benzene, toluene, ethylbenzene and xylenes (BTEX)
- Diesel range organics (DRO)

Pathway Evaluation

The human exposure pathways evaluated include: inhalation, ingestion of soil and water and dermal contact. The migration pathways considered include: migration to groundwater and/or surface water. Impacts to ecological receptors were also evaluated.

The exposure pathways to humans are currently limited because the contaminated soil is beneath a building and inaccessible. Response actions have reduced the contaminant levels so that they do not pose a hazard to human health or the environment. As long as the building remains in place and the soil is not accessible to humans, there is no unacceptable risk to human health and the environment. The groundwater has been proven to not have any petroleum contamination related to this release exceeding applicable ADEC cleanup levels. Therefore there is no completed exposure pathway to groundwater.

Cleanup Levels

The soil cleanup levels established for this site are the 18 AAC 75.341 (Tables B1 and B2) levels for Migration to Groundwater (under 40 inch zone). The groundwater cleanup levels for this site are the 18 AAC 75.345 (Table C) levels.

ADEC Decision

ADEC has determined that additional remediation of the diesel fuel oil release is not necessary at this time. The contaminated soil is not accessible to human receptors based on its location and present land use. Contamination, exceeding ADEC cleanup levels, has not been detected in the groundwater at the site. There was no indication of any impacts to surface water (or ecological receptors) from this incident.

There is residual soil contamination remaining at this site. However, with appropriate controls and restrictions, it will not pose an unacceptable risk to human health or the environment. Therefore, no further remedial action is required at this time and this site is approved for conditional closure, subject to the following condition:

1. The soil contamination located under the Power Building is currently inaccessible due to the buildings and structures located there. When (or if) the buildings are removed and/or the soil becomes accessible, ADEC shall be contacted for appropriate action. ADEC must approve any excavation, transport, remediation and/or disposal of soil from the site.

In accordance with 18 AAC 75.380(d)(2), ADEC may require additional site assessment, monitoring, remediation, and/or other necessary actions at this facility should new information become available that indicates contamination at this site may pose a threat to human health or the environment.

An institutional control will be established on the ADEC database to document residual soil contamination remaining on site above the most stringent 18 AAC 75.341 soil cleanup levels. Site closure (without conditions) will be considered when soil samples confirm that the soil meets the established ADEC soil cleanup levels for this site.

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 or concerns about this Conditional Closure decision, or the attached condition, please contact me at (907) 262-5210, extension #233.

Sincerely,



Don Seagren
Environmental Program Specialist
Department of Environmental Conservation

CC: Alex Tula, Alta Geosciences, Inc.

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