STATE OF ALASKA

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

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File No. ~~1516.38.017~~
1513.38.023

September 20, 2004

Mr. Larry Bamberger
AT&T
3530 Woodward Avenue
Seaward, NY 11783

Re: No Further Remedial Action Determination
AT&T Alascom Lena Point Earth Station
Database ID No. 1996110106601

The Alaska Department of Environmental Conservation (DEC) has reviewed the August 2004 Final Investigation Report and September 2004 amendments submitted by PacifiCorp Environmental Remediation Company (PERCo) for the referenced site. This letter presents DEC's findings.

Background

Lena Point Earth Station is located approximately 14 miles northwest of Juneau. The facility was constructed by the U.S. Air Force in 1954 as part of the Alaska Interior Microwave System (AIMS) connecting Fairbanks to Anchorage and the lower United States. The property was purchased by RCA Alaska Communication in 1971, and then later was acquired by PTI. PTI then sold the site to AT&T Alascom in 1995 and they have operated it as a commercial communications facility since that time.

An assessment of the site prior to the property transfer of the facility was completed in 1995 by Woodward Clyde. The purpose of the assessment was to identify recognized environmental conditions that may exist on the property prior to the sale from PTI to AT&T. Upon concluding the assessment, Woodward Clyde recommended that additional investigation occur at eight areas. These included the following:

- Power House Building
- 6000 Gallon AST
- Waste Storage Shed
- Former Burn Pit
- Materials Storage Building 500 Gallon AST
- 10 Meter Dish Antenna

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- 500 Gallon Waste Oil AST
- 2000 Gallon AST

A Phase II Site Investigation (SI) was conducted by Woodward Clyde in 1997. Results are documented in the report entitled; *Phase II Site Investigation – Lena Point Earth Station, Juneau, Alaska* (1997). Eight areas were investigated during the Phase II SI, plus an additional two areas that were discovered during the SI process. The two additional areas were:

- Septic System Leach Field
- Southwest Burn Area

Upon completing the Phase II SI work activities, Woodward Clyde concluded that the Septic System Leach Field, Waste Storage Shed and the Materials Storage Building AST areas required no additional investigation. Woodward Clyde then produced a Corrective Action Plan, dated May 10, 1999, specifying further investigation and remediation of the remaining areas.

Cleanup Levels

Per the request in the PERCo report, DEC hereby approves soil cleanup levels under 18 AAC 75.341 as method 1, category B. These cleanup levels are as follows:

Contaminant	Cleanup Level (mg/kg)
Benzene	0.5
Total BTEX	15
GRO	100
DRO	200
RRO	2000

Groundwater cleanup levels are found in 18 AAC 75.345, Table C.

Groundwater Considerations

Groundwater occurs at three to 10 feet below ground surface (bgs). The City and Borough of Juneau provides water service to the site. In the past, water was obtained from an on-site well approximately 30 to 40 ft deep. No active drinking water wells are known to be located near the site at this time.

Three groundwater monitoring wells were installed in December 2000. Two additional monitoring wells were installed near the downgradient property line in December 2001 to determine if off-site contaminant migration was a concern.

Initial sampling results from monitoring well MW-3 showed contaminant concentrations below cleanup levels for all constituents except DRO. Additional sampling through 2003 showed DRO levels fluctuating over an annual cycle and finally decreasing below the 1.5 mg/kg cleanup level.

MW-4 and MW-5, installed downgradient to the southeast to determine if contaminants were migrating off-site, were sampled quarterly from December 2001 through December 2003. Groundwater cleanup levels were not exceeded during any of the sampling events.

Cleanup Summary

Cleanup occurred in 2000. At that time excavation and confirmation sampling took place at the following areas:

- A - Power House Building
- B - 6000 Gallon AST
- D - 10 Meter Dish Antenna
- E - 500 Gallon Waste Oil AST
- F - 2000 Gallon AST

Excavated soils were stockpiled on-site, along with soils previously excavated during the Phase II SI.

In December 2000 contaminated soil totaling approximately 1,584 was sent to United Soil Recyling in Juneau for treatment and disposal. DEC approved this action on August 29, 2000.

The specific volume of soil removed from each area is summarized below

Area	Volume (cubic yards)
A – Power House Building	5
B and F – 6,000 gallon AST and 2,000 Gallon AST	350
D – 10 Meter Dish AST	300
E – 500 Gallon Waste Oil AST	809
G – Southwest Burn Area	120
TOTAL	**1,584**

Determination

The investigation and cleanup of the Lena Point Earth Station site meets all requirements specified in 18 Alaska Administrative Code (AAC) 75 Article 3 - Discharge, Reporting, Cleanup, and Disposal of Oil and Other Hazardous Substances. No further remedial action is required. The site will be closed on DEC's contaminated sites database following expiration of the right to an adjudicatory hearing as set forth herein.

In accordance with 18 AAC 75.380(d)(1), additional investigation and cleanup may be required if new information is discovered which leads DEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment. If the conditions in this decision are not met, additional requirements may be imposed and/or enforcement action initiated by DEC.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195-15.340 and 18 AAC 75.385 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 of the decision date. 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 of the decision date. The right to appeal is waived if a hearing is not requested within 30 days.

Sincerely,

William Janes
Project Manager