



THE STATE
of **ALASKA**
GOVERNOR MICHAEL J. DUNLEAVY

**Department of
Environmental Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Site Program

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File: 1521.38.004

January 25, 2019

Mr. Greg Rainwater
AT&T Environment, Health & Safety
308 South Akard Street, Room 1700
Dallas, TX 75202

Re: Decision Document: AT&T Alascom Duncan Canal Repeater
Cleanup Complete Determination

Dear Mr. Rainwater:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (ADEC) has completed a review of the environmental records associated with the AT&T Alascom Duncan Canal Repeater site located 9 Miles SW of Petersburg; Kupreanof Island. Based on the information provided to date, it has been 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 unless new information becomes available that indicates residual contaminants may pose an unacceptable risk.

This Cleanup Complete determination is based on the administrative record for the AT&T Alascom Duncan Canal Repeater site, which is located in the ADEC office in Anchorage, Alaska. This decision letter summarizes the site history, cleanup actions and levels, and standard site closure conditions that apply.

Site Name and Location:

AT&T Alascom Duncan Canal Repeater
S17, T59, R77 Petersburg D-4

Name and Mailing Address of Contact Party:

Mr. Greg Rainwater
AT&T Environment, Health & Safety

308 South Akard Street, Room 1700

Dallas, TX 75202

DEC Site Identifiers:

File No.: 1521.38.004
Hazard ID.: 3281

Regulatory Authority for Determination:

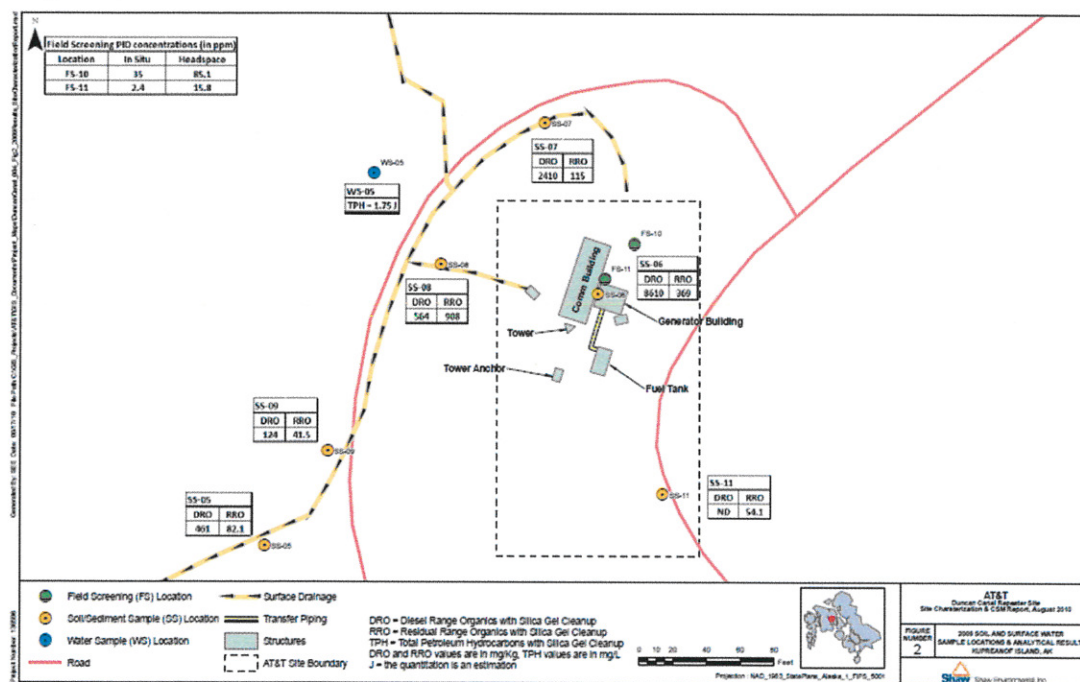
18 AAC 75

Site Description and Background

Since approximately 1976, AT&T has leased a 0.6 acre area from the U.S. Forest Service (USFS) for telecommunications operations on Kupreanof Island, approximately 9 miles southwest of Petersburg, Alaska. The site is at an elevation of 2,335 feet above mean sea level and is only accessible by helicopter or watercraft. The site includes a telecommunication building, power generation building with a diesel generator and associated equipment, 6,000 gallon above-ground diesel storage tank and antenna tower.

On August 29, 2008, an AT&T consultant contacted ADEC to coordinate a site visit to evaluate a diesel spill at AT&T's Duncan Canal Repeater Facility near Petersburg, Alaska. A generator fuel supply line failure that was traced back to 2007 resulted in loss of over 2,000 gallons of diesel that went unrealized until 2008 when the US Forest Service discovered drainage channels leading from the site were contaminated with diesel. One of the runoff channels intersected a hazardous debris landfill associated with the US Air Force Duncan Canal Radio Relay Station site cleanup.

The figure below shows the layout of the site as well as the 2009 soil and surface water sample locations and corresponding analytical results.



The spill was reported to ADEC's Prevention and Emergency Response Program (PERP) on August 26, 2008 and logged as Spill No. 07119930501 with a recorded spill date of September 7, 2007. The source of the spill was a cracked fuel line from the generator above the ground storage tank. The reported spill quantity was 200 gallons, but subsequent review of fuel records indicated a discrepancy and that the spill was closer to 2,000 gallons. The site was transferred to the ADEC Contaminated Sites Program in February 2010.

Contaminants of Concern

During the site characterization and cleanup activities at this site, samples were collected from soil and surface water. All soil samples were analyzed for DRO and RRO with silica gel cleanup. Those with high PID readings were also analyzed for PAHs. The landfill sludge was analyzed for DRO, RRO, PAHs and metals, VOCs and PCBs. Surface water samples were collected and analyzed for total

petroleum hydrocarbons, VOCs and PAHs. Based on these analyses, the following contaminants were detected above the applicable cleanup levels and are considered Contaminants of Concern at this site:

- Diesel Range Organics (DRO)
- Residual Range Organics (RRO)

Cleanup Levels

A March 20, 2014 letter from ADEC to AT&T references a July 15, 2013 email which notified AT&T of the cleanup level requirements at the site per 18 AAC 75.325. The email stated the hydrocarbon COC cleanup level for DRO in soil at the site is 8,250 mg/kg and that the Method Two cleanup level for the Over 40-inch rainfall zone, migration to groundwater apply for all other potential COCs for the site with the exception of RRO, for which the more conservative ingestion pathway cleanup level of 8,300 mg/kg applies. The cleanup values were chosen based on the mountain top site location, lack of groundwater in the area, and the shallow refusal depth when soil sampling.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)
DRO	8,250
RRO	8,300

mg/kg = milligrams per kilogram

Characterization and Cleanup Activities

Characterization and cleanup activities conducted under the regulatory authority of the Contaminated Sites Program began in 2008. These activities are described below.

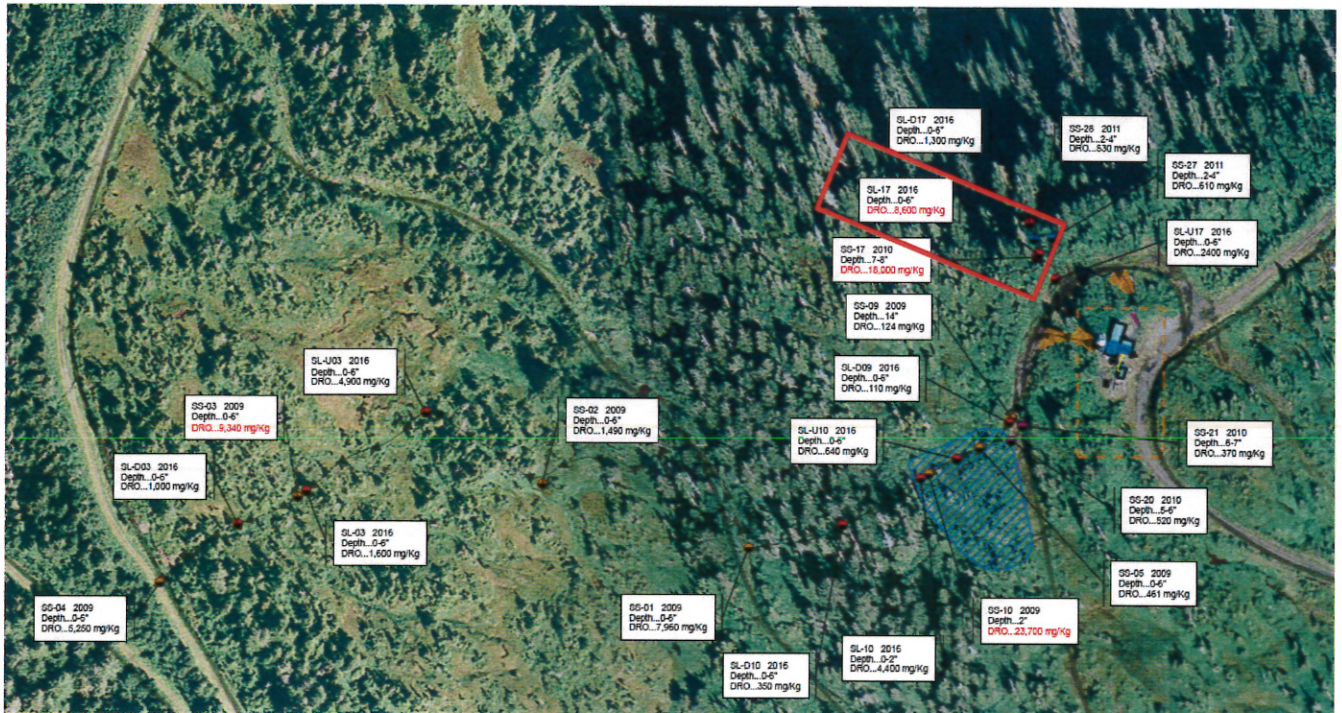
Site characterization activities were performed between 2008 and 2011 and included soil sampling on the AT&T leasehold and within drainages extending north and west of the leasehold. Impacted drainages were found to exist on and/or adjacent to identified USAF buried debris areas.

In July 2011, four areas within the leasehold (Areas 1 through 4) were treated with RegenOx® in an effort to reduce the concentrations of petroleum constituents in soil. Reapplication of RegenOx® was conducted at select locations in August 2011. Confirmation soil sampling was conducted in July and August 2011 at the treated areas. One sample collected in August 2011 from Areas 1 and 4 exhibited DRO greater than the cleanup level. Samples collected from Areas 2 and 3 in August 2011 did not exhibit DRO greater than the cleanup standard. No samples exhibited a RRO concentration greater than the cleanup standard.

The map below identifies the four areas (Areas 1 through 4) that were treated with RegenOx®.

completion of the site inspection, shallow soil samples were collected from drainages below the Former Access Road extending north (SS-17 Area) and west (Southwest Drainage) of the AT&T lease boundaries. The proposed soil sampling locations focused where previously-collected samples in drainages exhibited DRO or RRO concentrations that exceeded ADEC cleanup standards, as well as locations upstream and downstream of locations with elevated soil DRO or RRO. These sample locations include SS-03, SS-10, and SS-17. A soil sample also was collected at previous sample location SS-09 due to the upstream location of the DA001 debris area. Only the sample collected at the SS-17 location (referenced as SL-17) exhibited a DRO concentration above the cleanup level of 8,250 mg/kg.

The map below shows results of the DRO silica gel cleanup concentrations in soil below the former access road in 2009-2011 and 2016. The area within the red rectangle is the SL-17 sample result in 2016, with a DRO concentration remaining above the cleanup level.



In September 2017, the USAF conducted excavation activities at the landfill lip that coincides with the SS-17/SL-17 sample locations. Therefore, soil impacted with diesel in the drainage represented by samples SS-17/SL-17 has been removed.

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 noncarcinogenic 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 meet the human health cumulative risk criteria for residential land use.

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 show all pathways to be one of the following: De-Minimis Exposure or Pathway Incomplete. A summary of this pathway evaluation is included in Table 2.

Table 2 – Exposure Pathway Evaluation

Pathway	Result	Explanation
Surface Soil Contact	De-Minimis Exposure	Contamination is below the human health cleanup levels.
Sub-Surface Soil Contact	De-Minimis Exposure	DRO concentrations in remaining soil are between Method Two Table B2 Migration to Groundwater and human health ingestion levels.
Inhalation – Outdoor Air	Pathway Incomplete	Contamination remains in the subsurface, but no volatile compounds are present at levels above outdoor inhalation screening levels.
Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Buildings are present but any remaining volatile petroleum levels are either below laboratory reporting limits and/or the inhalation and migration to groundwater screening levels.
Groundwater Ingestion	Pathway Incomplete	The exposure risk to human receptors for this pathway is incomplete as groundwater is not present at the site.
Surface Water Ingestion	De-Minimis Exposure	Surface water hydraulically connected to the site is not of sufficient quality or quantity for a potable water source. Surface water bodies were not impacted by contamination.
Wild and Farmed Foods Ingestion	Pathway Incomplete	The site may be a wild foods harvest area but the COC has no potential to bioaccumulate in flora or fauna.
Exposure to Ecological Receptors	Pathway Incomplete	Terrestrial receptors are present seasonally. DRO does not bioaccumulate in flora and concentrations are between Method Two Table B2 Migration to Groundwater and human health ingestion levels.

Notes to Table 2: “De-Minimis Exposure” means that in ADEC’s judgment receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination. “Pathway Incomplete” means that in ADEC’s judgment contamination has no potential to contact receptors.

ADEC Decision

Soil contamination at the site have been cleaned up to concentrations below the approved human health cleanup levels suitable for residential land use. This site will receive a “Cleanup Complete” designation on the Contaminated Sites Database, subject to the following standard conditions.

Due to the mountain top site location, lack of groundwater in the area, and the shallow refusal depth when soil sampling, the migration to groundwater pathway is not of concern.

Standard Conditions

1. Any proposal to transport soil or groundwater from a site that is subject to the site cleanup rules or for which a written determination from the department has been made under 18 AAC 75.380(d)(1) that allows contamination to remain at the site above method two soil cleanup levels or groundwater cleanup levels listed in Table C requires DEC 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 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.
3. Groundwater throughout Alaska is protected for use as a water supply for drinking, culinary and food processing, agriculture including irrigation and stock watering, aquaculture, and industrial use. Contaminated site cleanup complete determinations are based on groundwater being considered a potential drinking water source. In the event that groundwater from this site is to be used for other purposes in the future, such as aquaculture, additional testing and treatment may be required to ensure the water is suitable for its intended use.

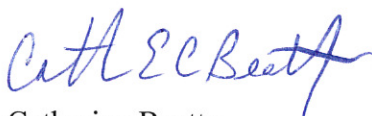
This determination is in accordance with 18 AAC 75.380 and does not preclude ADEC from requiring additional assessment and/or cleanup action if future information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

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, 555 Cordova Street, Anchorage, Alaska 99501-2617, within 20 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, P.O. Box 111800, 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 questions about this closure decision, please feel free to contact me at (907) 269-7527, or email at catherine.beatty@alaska.gov.

Sincerely,



Catherine Beatty
Project Manager

Electronic cc: Spill Prevention and Response, Cost Recovery Unit
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