STATE OF ALASKA

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

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File: 900.38.017

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Larry Bamberger
Environmental Health & Safety Operations Manager
AT&T
1444 E. Jericho Turnpike
Room B135
Huntington, NY 11743-5456

Re: Slope Repeater
Section 16 and 17, Township 8 South, Range 13 East, Umiat Meridian

Dear Mr. Bamberger:

The Alaska Department of Environmental Conservation (ADEC), Contaminated Sites Program, reviewed the ENSR report dated October 23, 2007 for the Slope Repeater site. Based on the information presented to date for this facility, ADEC has determined that contaminated soil was removed from the site and, as a result, there are no risks to human health or the environment. Based on this information, no further remedial actions are required and the Slope Repeater site shall be closed.

Please note the following information was considered in making the determination on the environmental status of this property.

Site Background
The Slope Repeater site is located several miles southwest of Pump Station 3 and west of the pipeline corridor. It serves as a communications site consisting of a microwave tower, a generator module, a battery module and 4 above ground fuel tanks. It is a remote site accessible by helicopter or all terrain vehicles.

The soil at the site consists of an organic layer underlain by silty sand and gravel with bedrock about 3 feet below ground surface (bgs). The fuel tanks are above ground and refueled by helicopter sling loads. The tanks and the refueling area were retrofitted recently to prevent and/or contain any spills.

In 2004, an area under tank 1 was identified with impacted soil and less than 1 cubic yard was removed. The fuel bladder staging area (40 feet southwest of the tank array) was identified as an area of concern and approximately 1 cubic yard of soil was removed. There were also several burn pit areas from which 1 cubic yard of soil was removed. The generator module area had several

small areas with stained soil and less than 1 cubic yard was removed. The confirmation samples from all the areas verified no contamination remained above ADEC cleanup levels.

In 2005, a minor release of lube oil at the generator module resulted in 1 cubic yard of soil being removed. A soil sample from the area detected 3250 milligrams per kilograms (mg/kg) diesel range organics (DRO) and additional excavation (less than 1 cubic yard) in 2006 removed the residual contamination above cleanup levels.

Contaminants of Concern
Diesel Range Organics (DRO)

Pathway Evaluation
The exposure pathways evaluated under this decision include ingestion, dermal contact, and inhalation. These human health pathways may be complete if soil becomes exposed but the soil contamination remaining does not exceed the 18 AAC 75.341 cleanup levels established for these pathways. Therefore, it was determined there is no unacceptable risk to human health at this site posed by residual soil contamination remaining on site.

The migration to groundwater pathway was considered at this site but the shallow depth to bedrock (2 feet bgs) and the minor extent of contamination do not pose unacceptable risks to groundwater. The groundwater in the area is not currently used as a drinking water source and is not expected to be in the future.

There is no surface water pathway at the site.

Cleanup Levels
The soil cleanup levels established for this site are the 18 AAC 75.341 Method 2, Arctic zone, levels. However, off site transport of contaminated soil may require a more stringent cleanup level based on the proposed transport location.

The groundwater cleanup levels are the 18 AAC 75.345 Table C levels and surface water cleanup levels are 18 AAC 70 water quality standards.

ADEC Decision
The cleanup actions conducted at the Slope Repeater site were effective in removing any soil contamination resulting from the storage and use of diesel fuel. Even though residual soil contamination may remain it is minor in extent and does not pose an unacceptable risk to human health or the environment. Furthermore, preventative measures have been adopted to prevent (or minimize) future spills or releases through the use of secondary containment equipment; double wall supply and return fuel lines; and other refueling upgrades.

Based on the information provided to date, the Slope Repeater site is approved for environmental closure status.

In accordance with 18 AAC 75.380(d)(1), additional investigation and cleanup may be required if new information is discovered which leads ADEC to make a determination that the cleanup described in this decision is not protective of human health, safety, and welfare or the environment.

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 of the decision. 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. If a hearing is not requested within 30 days, the right to appeal is waived.

If you have any questions, please contact Jim Frechione at (907)451-5175 or email jim.frechione@alaska.gov.

Sincerely,

Jim Frechione
Environmental Manager

cc: Chris Humphrey, ENSR