THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program
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February 14, 2024

Jana Lee
AT&T Alascom
505 E. Bluff Drive
Anchorage, AK 99501
Sent via electronic mail only

Re: Institutional Controls (ICs) update for:
AT&T Alascom King Salmon Earth Station, Airport Road; Lot 5, Lot 6, and Lot 7, King Salmon, Alaska 99613

Dear Jana:

The Contaminated Sites Program conducts periodic verification of closed sites where institutional controls (land use restrictions) are required under 18 AAC 75.375.

In 2010 the AT&T Alascom King Salmon Earth Station site was assigned a Cleanup Complete with Institutional Controls designation (document enclosed), which documented the requirement of addressing the soil contamination remaining under the Power Building aboveground storage tank (AST) when the infrastructure was removed, and the contamination was accessible. Impacted soil was found to have concentrations of diesel range organics (DRO) that exceeded Alaska Department of Environmental Conservation (ADEC) cleanup levels.

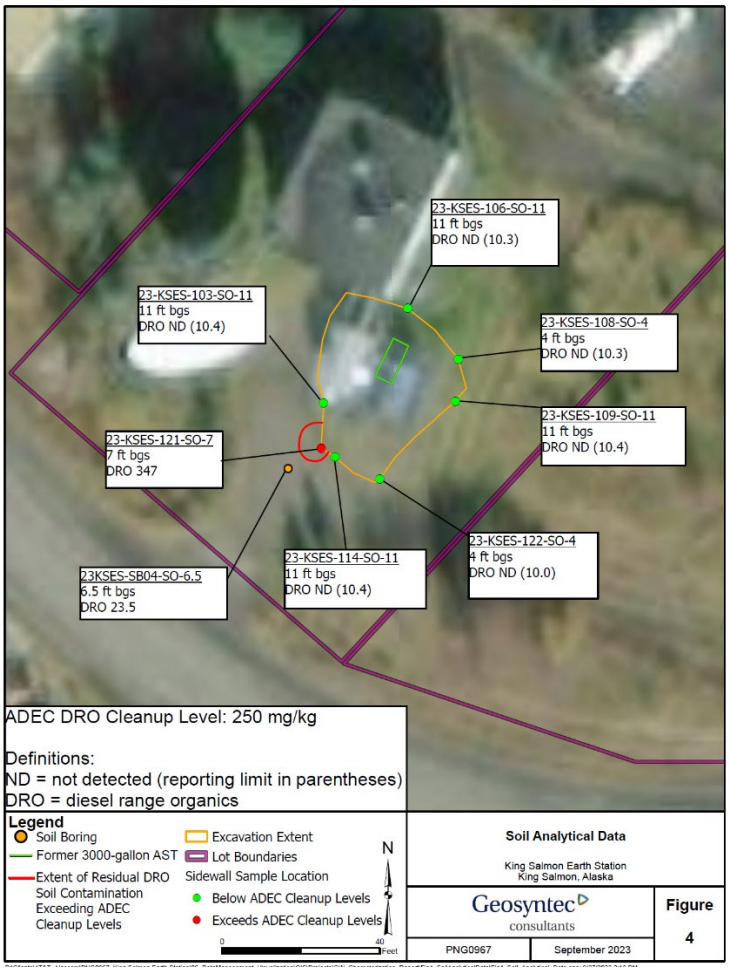
Recently the property has been vacated by AT&T Alascom and the lease with the Alaska Department of Transportation and Public Facilities (ADOT&PF) has been discontinued. Corrective action has occurred on this property after the removal of the AST and nearby Power Building. This letter will document the corrective actions, groundwater sampling, and the current conditions of the property.

2023 Site activities

Soil characterization and removal
Impacted soil associated with the former Power Building aboveground storage tank (AST) had previously been found to have concentrations of DRO that exceeded ADEC cleanup levels. In the spring of 2023, with an ADEC approved work plan, the AT&T Alascom contractor Geosyntec completed characterization and removal of approximately 302 cubic yards of diesel-impacted soil. The excavated soil was containerized and transported off-site for disposal at the Columbia Ridge Landfill facility in Arlington, Oregon. Soil was excavated to approximately 13 feet below the ground surface (bgs) in the contaminant source area, at which depth groundwater was encountered.

Excavation wall samples were analyzed for DRO, gasoline range organics (GRO), petroleum volatile organic compounds (VOCs), and polycyclic aromatic hydrocarbons (PAHs). DRO was the only contaminant which exceeded (347 mg/kg) the migration to groundwater cleanup level of 250 mg/kg and that was in one sample taken from the southwestern corner of the excavation. During the excavation, it became evident that soil impacts extended to the water table at approximately 13 feet below the ground surface (bgs) and that sampling of the groundwater would be needed. The DRO concentration in the excavation floor sample was above cleanup levels at 3,350 mg/kg. Removal of DRO-impacted soil from above the water table has been generally accomplished, and the excavation has been backfilled.

The July 2023 additional subsurface soil characterization (included with the groundwater characterization effort) found that residual DRO impacts in subsurface soil are limited to a small region on the southwest sidewall of the excavation area, in a depth interval of 7 to 9.5 feet bgs (Figure 4). The DRO concentrations for this residual soil contamination (347 mg/kg) slightly exceed the ADEC Migration to Groundwater cleanup level (250 mg/kg), but do not exceed the cleanup level for Human Health Exposure Pathways.



Groundwater characterization

In July 2023 site characterization including the groundwater investigation continued. The characterization included drilling six soil borings; field screening soil samples for the presence of petroleum hydrocarbons; installing monitoring wells in five of the soil borings; and collecting subsurface soil and groundwater

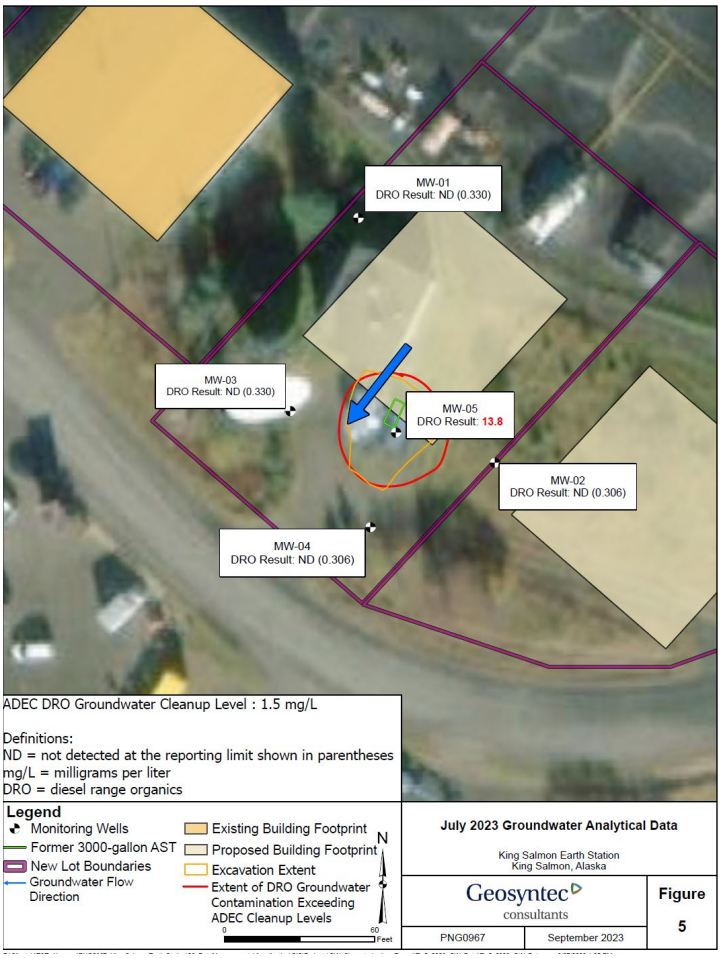
analytical samples. Groundwater samples were analyzed for DRO, GRO, VOCs, and PAHs. DRO was the only contaminant that had concentrations above the Table C groundwater cleanup levels.

DRO contamination in groundwater is present in the source area at concentrations that exceed ADEC groundwater cleanup levels (Figure 5) with the highest at 13.8 mg/L. The lateral extent of impacted groundwater has been delineated and does not appear to be migrating off-site. Although the identified groundwater contamination is present in the A-Aquifer, which is generally not used for drinking water wells, previous studies have demonstrated that there is hydraulic communication between the A- and B-Aquifers. Most private drinking water wells in King Salmon are screened in the B-Aquifer. Groundwater exposure pathways are complete for current and future receptors.

A second groundwater monitoring event will be performed in the spring of 2024 for the five monitoring wells on the site for DRO only. Upon completion of that monitoring event, the two rounds of groundwater data will be used to develop a Long-Term Groundwater Monitoring Plan for the AT&T Alascom site. When monitoring demonstrates that DRO concentrations are below the groundwater cleanup levels or a decreasing trend has been established, ADEC will consider rescinding the need for future monitoring and removing the remaining institutional controls.

Geosyntec notes in the Site Characterization Report that the development of the site by future leaseholders may conflict with the existing monitoring well network. If any monitoring wells are determined to require removal to support site development, Geosyntec recommends that they be properly decommissioned. A decision should be made as to whether the well to be decommissioned is required for the monitoring program. If so, a replacement well should be installed at an appropriate location.

For waste characterization of the groundwater used for sampling, one sample from the drum containing fluids was taken for per- and polyfluoroalkyl substances (PFAS) compounds. This PFAS waste characterization sample was collected because shallow groundwater in King Salmon is commonly impacted with PFAS due to military activities at the King Salmon Air Force Station which is located upgradient from the AT&T Alascom property. There are no PFAS sources present on the AT&T Alascom property.



To summarize, the 2023 site characterization findings include:

- DRO soil contamination at the site has migrated to and impacted the groundwater in the source area at concentrations that exceed ADEC cleanup levels.
- DRO groundwater contamination is delineated and has not migrated off site (Figure 5).
- The residual DRO soil contamination on the southwestern sidewall wall of the April-May 2023 excavation has been delineated and extends less than 10 feet laterally from the excavation (Figure 4).

The standard and site-specific conditions and/or institutional controls have been modified from the original conditions included in the 2010 decision due to the 2023 sites actions and updated information. They are as follows:

1. If land use and/or ownership changes, current institutional controls may now be protective and ADEC may require additional remediation and/or institutional controls. Therefore, AT&T Alascom will report to ADEC every five years to document land use, or as soon as AT&T becomes aware of any change in land use. The report can be sent to the local ADEC office or submitted electronically to CS.Submittals@alaska.gov.
2. Groundwater monitoring must occur in 2024. From the 2023-24 data, a long-term monitoring plan will be established with ADEC's approval. Monitoring must be continued until DRO concentrations

in the groundwater have decreased below the Table C groundwater cleanup levels, or a consistent decreasing trend has been demonstrated.

3. ADEC approval is required prior to moving any soil or groundwater off any site that is, or has been, subject to the site cleanup rules [see 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. In the future, if soil will be excavated or groundwater will be brought to the surface (for example to dewater in support of construction) it must be characterized and managed following regulations applicable at that time and ADEC approval must be obtained before moving the soil or water off the property. *This is a standard condition*.
4. Movement or use of contaminated material in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. *This is a standard condition.*

In accordance with 18 AAC 75.380(d)(2), ADEC may require additional site assessment, monitoring, remediation, and/or 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.

This site information is a matter of public record and is available through ADEC's online database record at: http://dec.alaska.gov/Applications/SPAR/PublicMVC/CSP/SiteReport/2819/. The 2023 site characterization reports can be found at this database record.

If you have any questions regarding, please contact me at (907) 465-5229 or evonne.reese@alaska.gov and I will be glad to assist you.

Sincerely,

Evonne Reese

Evonne Reese
Environmental Program Specialist
Institutional Controls Unit

Encl: 2010 Cleanup Complete Determination – Institutional Controls

cc: Sharyn Augustine, ADOT&PF
Greg Rainwater, Apex Companies, LLC