



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF SPILL PREVENTION AND RESPONSE
Contaminated Sites Program

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DEC File No: 100.38.170

November 20, 2024

Jurandir Felipe-Ortega
AT&T
Environmental Health & Safety
211 S. Akard Street, Suite 1200
Dallas, Texas 75202

Re: Decision Document: AT&T Alascom Fairbank Warehouse
Cleanup Complete Determination – 2010 institutional controls rescinded

Dear Jurandir Felipe-Ortega:

The Alaska Department of Environmental Conservation, Contaminated Sites Program (DEC) has completed a review of the environmental record, including the institutional control requirements associated with the AT&T Alascom Fairbanks Warehouse located at 704 30th Avenue in Fairbanks. Based on the information provided to date, it has been determined that the contaminant concentrations remaining on site does not pose an unacceptable risk to human health or the environment and the institutional control requirements can be removed from this site record. No further remedial action will be required unless information becomes available that indicates residual contaminants may pose an unacceptable risk. The site status is changed to Cleanup Complete.

This determination is based on the administrative record for the AT&T Alascom Fairbanks Warehouse maintained by DEC. This decision letter summarizes the site history, cleanup actions and levels, and site closure conditions that apply.

DEC Site Identifiers:

File No.: 100.38.170
Hazard ID.: 2906

Regulatory Authority for Determination:

18 Alaska Administrative Code (AAC) 75

Site History since the 2010 Cleanup Complete with Institutional Controls

Characterization and remediation of this site occurred between 2001 and 2010. In 2010, the status was changed from Active to Cleanup Complete with Institutional Controls (ICs). An IC requirement included in the decision was that groundwater monitoring occur every other year for the contaminants diesel range organics (DRO) and benzene until two consecutive monitoring events documented contaminant levels below the Table C cleanup levels. AT&T complied with this requirement and groundwater monitoring conducted in 2019 and 2021 showed that the Table C cleanup levels were met.

Contaminants of Concern

Prior to the 2010 site closure, remaining subsurface soil was sampled for DRO and volatile organic compounds. During the post-closure with ICs (after 2010), groundwater monitoring samples were collected and analyzed for DRO and benzene. Based on these analyses, the following contaminants were detected above the applicable soil and groundwater cleanup levels and are considered Contaminants of Concern (COCs) at this site:

- DRO
- Benzene

Cleanup Levels

Soil cleanup levels applicable to the site are the most stringent Method 2 cleanup levels for the under 40-inches of precipitation climate zone found in 18 AAC 75.341(c), Table B1 and 18 AAC 75.341(d), Table B2. Groundwater cleanup levels applicable to this site are found in 18 AAC 75.345, Table C.

Table 1 – Approved Cleanup Levels

Contaminant	Soil (mg/kg)	Groundwater (µg/L)
DRO	250	1,500
Benzene	0.022	4.6

Notes:

1. mg/kg = milligrams per kilogram
2. µg/L = micrograms per liter

Characterization and Cleanup Activities since 2010

Beginning in 2011, groundwater monitoring for DRO and benzene was conducted every two years. Benzene concentrations were below the Table C cleanup level in the 2011 and 2013 monitoring events, so was eliminated from future sampling. Concentrations of DRO in the groundwater decreased with each monitoring event and the 2019 and 2021 results were both below the Table C cleanup level. A 2022 DEC letter documented agency approval to discontinue groundwater sampling at the site. In 2023, the groundwater well (MW-7) was decommissioned.

Remaining Contamination

As stated in the 2010 Cleanup Complete - ICs letter –

In 2006, the final corrective action was performed where 420 additional cubic yards of DRO contaminated soil were removed around the former septic system. A small amount of DRO contaminated soil remained at the limits of the excavation in the groundwater smear zone (8-10 feet below the ground surface (bgs)) and is above the 18 AAC 74.341 Method Two migration to groundwater cleanup levels. This remaining contamination was located approximately 30 feet to the southeast of the southeast corner of the warehouse. DRO concentrations in this area ranged between 1,970 and 7,300 mg/kg. Further remediation was not practicable because contamination was present in the saturated zone.

Groundwater monitoring between 2011 – 2021 concluded that DRO and benzene concentrations in the groundwater had decreased to below Table C cleanup levels for both contaminants.

Table 2a – Maximum Contaminant Concentrations Remaining in Soil

Contaminant	Soil (mg/kg)	Sample Location	Date Sampled
DRO	1,970 – 7,300	SE corner of warehouse (8-10' bgs)	2006

Table 2b – Maximum Contaminant Concentrations Remaining in Groundwater

Contaminant	Groundwater (µg/L)	Sample Location	Date Sampled
DRO	959	MW-7	2021
Benzene	2.83	MW-7	2013

Exposure Pathway Evaluation

Following investigation and cleanup at the site, exposure to the remaining contaminants was evaluated using DEC'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, Exposure Controlled, 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	Pathway Incomplete	Contamination has been removed.
Subsurface Soil Contact	De Minimis Exposure	Contamination remains in the smear zone, levels are below direct contact cleanup levels.
Inhalation – Outdoor Air	De Minimis Exposure	Contamination remains in the subsurface, but is below inhalation cleanup levels.

Inhalation – Indoor Air (vapor intrusion)	Pathway Incomplete	Remaining contamination does not include volatile compounds. Benzene was present above cleanup levels in 2006. Further monitoring events did not detect benzene above cleanup levels.
Groundwater Ingestion	De Minimis Exposure	Groundwater monitoring was completed in 2022 after two consecutive events of DRO results below the Table C cleanup levels.
Surface Water Ingestion	Pathway Incomplete	There is no surface water located within ¼ miles of the site.
Wild and Farmed Foods Ingestion	Pathway Incomplete	Contaminants of concern do not have the potential to bioaccumulate in plants or animals.
Exposure to Ecological Receptors	Pathway Incomplete	No terrestrial or aquatic exposure routes are present.

Notes:

1. “De Minimis Exposure” means that, in DEC’s judgment, the receptors are unlikely to be adversely affected by the minimal volume or concentration of remaining contamination.
2. “Pathway Incomplete” means that, in DEC’s judgment, the contamination has no potential to contact receptors.
3. “Exposure Controlled” means there is an IC in place limiting land or groundwater use and there may be a physical barrier in place that prevents contact with residual contamination.

DEC Decision

Groundwater monitoring demonstrated that DRO and benzene concentrations in the groundwater have decreased to below Table C cleanup levels for both contaminants. Although soil is present at concentrations above the approved migration to groundwater exposure pathway cleanup level, DEC believes that this soil does not pose a risk to groundwater as the COC concentrations in groundwater are below the Table C cleanup levels. Soil and groundwater contamination at the site are below the approved cleanup levels suitable for residential land use. This site record has been updated to show a “Cleanup Complete” designation on the Contaminated Sites Database. DEC will file a Termination of the 2017 Notice of Environmental Contamination with the Recorder’s Office (draft enclosed).

DEC approval is required for movement and disposal of soil and/or groundwater subject to the Site Cleanup Rules, in accordance with 18 AAC 75.325(i). Please contact DEC for information about applicable regulations and requirements. A “site,” as defined by 18 AAC 75.990, means an area that is contaminated, including areas contaminated by the migration of hazardous substances from a source area, regardless of property ownership.

Movement or use of contaminated material in an ecologically sensitive area or in a manner that results in a violation of 18 AAC 70 water quality standards is prohibited. Furthermore, 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. If, in the future, groundwater from this site is to be used for other purposes, 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 DEC from requiring additional assessment and/or cleanup action if information indicates that contaminants at this site may pose an unacceptable risk to human health, safety, or welfare or to the environment.

Informal Reviews and Adjudicatory Hearings

A person authorized under a provision of 18 AAC 15 may request an informal review of a contested decision by the Division Director in accordance with 18 AAC 15.185 and/or an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340. See DEC’s “Appeal a DEC Decision” web page <https://dec.alaska.gov/commish/review-guidance/> for access to the required forms and guidance on the appeal process. Please provide a courtesy copy of the adjudicatory hearing request in an electronic format to the parties required to be served under 18 AAC 15.200. Requests must be submitted no later than the deadline specified in 18 AAC 15.

If you have questions about this closure decision, please feel free to contact me at (907) 465-5229, or email at evonne.reese@alaska.gov.

Sincerely,



Evonne Reese
ICs Project Manager

Encl: 2010 Cleanup Complete with ICs determination
2024 Termination of Notice of Environmental Contamination