



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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ONIS "TREY" GLENN, III, P.E.

DIRECTOR

BOB RILEY

GOVERNOR

July 19, 2005

LTC Wayne Sartwell
State Military Department
P. O. Box 3711
Montgomery, AL 36109

Dear LTC Sartwell:

RE: REVIEW OF ARBCA TIER 1/TIER 2 REPORTS

OMS No. 28 PIT-2
1622 South Broad Street
Mobile, Mobile County, Alabama
Facility I.D. No. 14587-097-012257
UST Incident No. UST93-02-15

Facsimiles: (334)

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General Counsel: 394-4332
Communication: 394-4383
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Groundwater: 270-5631
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Laboratory: 277-6718
Mining: 394-4326

The Department has reviewed the ARBCA Tier1Evaluation Report dated May, 2005 and the ARBCA Tier 2 Evaluation Report dated May 31, 2005 which proposes site specific corrective action limits for soil and groundwater for this site. The Department has determined that the report as submitted is deficient and several items require further clarification.

Please address the items listed below:

General: Insure that the correct version of the ARBCA Guidance is used. It appears that the incorrect version of guidance was used. The correct guidance to be used is "ARBCA: Alabama Risk-Based Corrective Action For Underground Storage Tanks (Revised November 2001)". The revised ARBCA Manual (\$15.00) and/or Software (\$100.00) can be obtained from the ADEM Groundwater Branch by faxing a request to Catherine Youngblood at 334/270-5631 or by e-mail at cly@adem.state.al.us On your request, please include the name of person requesting item(s), name of firm, and mailing address. Upon receipt of your request, an invoice will be prepared and mailed out with the manual and/or software. The ARBCA manual (but not forms and software) is also available on the ADEM website.

This guidance, particularly Appendix B, should be carefully reviewed to insure that all required information and attachments are included prior to submission of the revised reports requested below.

- Some, certainly not a comprehensive list, of items that require correction are listed below.
 1. Form 9: Hydraulic Conductivity (K): This value should be in units of cm/sec.
 2. Form 9: Darcy Velocity (Ki): This value should be in units of cm/yr.
 3. Form 10: Does not include all information required by the correct version of ARBCA.
 4. There are no on-site residents, therefore all resident receptor are not complete for residents and residential exposure does not have to be evaluated. **However see Caution below**
 5. Attachment 14: The source dimensions should be determined based on the dimensions of the former UST system; generally this would be the dimensions of the tank pit unless extensive product piping to a dispenser was present.
 6. Attachment 15: A summary of Representative site Concentration is included, however a figure showing the development of the Thiessen polygons and the respective calculations of the areas of the polygons was not included.



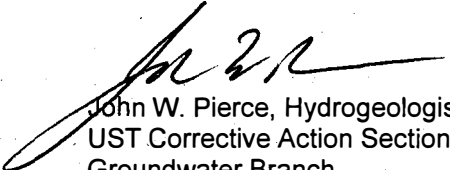
7. Form 24: Depth to Subsurface Soil Sources: This value in units of centimeters should be the depth at which the first contaminated soil was detected or an average depth of the shallowest detected contamination from several borings.
8. Tier 1 and 2 Reports: All required attachments were not included

Caution: When running the ARBCA Program, All of the boxes must be checked on the Site Conceptual Exposure, Complete Pathway(s) and Route(s) of Exposure Screen even though the receptor pathways are known to be incomplete.

Please address the items listed above and submit a revised report that includes both Tier 2 and Tier 2 Evaluations as a combined document as should have been originally submitted to reach the department **by September 30, 2005.**

If you have any further questions regarding this matter, please call me at (334) 271-7792.

Sincerely,



John W. Pierce, Hydrogeologist
UST Corrective Action Section
Groundwater Branch
Water Division

JWP/bjm

CC: Ms. Melissa Shirley, Department of the Army, Mobile District, Corps of Engineers
P. O. Box 2288, Mobile, AL 36628-0001