



Alabama Department of Environmental Management  
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June 28, 2007

Alabama National Guard  
c/o: Mr. William Turk  
P.O. Box 3711  
Montgomery, AL 36109-0711



Dear Mr. Turk:

**RE: ALABAMA NATIONAL GUARD SITE**  
Organizational Maintenance Shop (OMS-28)  
1622 South Broad Street  
Mobile, Mobile County, Alabama  
Groundwater Incident No. GW 07-01-02

The Alabama Department of Environmental Management is in receipt of the report entitled "TCE Comprehensive Investigation at Organizational Maintenance Shop 28." Upon review of the report, the following was determined:

1. The report documents the sampling of temporary wells TW-1, TW-3, TW-4, TW-5, PZ-1 and PZ-2; however, the report does not include detailed information regarding how these wells were constructed, installed, purged and sampled during this sampling period, and if these well currently exist onsite. Additionally, the report does not include boring logs and well construction diagrams for these temporary wells. All information with respect to these wells should be submitted to ADEM for review.
2. The groundwater analysis collected from Direct Push Technology (DPT) wells are only deemed as screening data. Therefore, the Department agrees with the reports recommendation to install additional monitoring wells at the site to define the horizontal and vertical extent of contamination in groundwater. The Department recommends that additional monitoring wells are warranted between well MW-8 and temporary well TW-3, and in the vicinity of temporary wells TW-1 and TW-7. Additionally, due to the type of contaminant's of concern (chlorinated constituents), monitoring wells screened in a deeper groundwater producing zone or aquifer should be installed in the source area (adjacent to MW-8) and adjacent to temporary well TW-6 and monitoring well MW-12. All existing and proposed monitoring wells should be sampled for all VOCs. A work plan should be developed and submitted to ADEM for review and approval that incorporates detailed information regarding how the recommended monitoring wells will be installed, constructed, developed and sampled.
3. Soil samples should be obtained from soil intervals between the upper saturated zone and the deeper saturated zone from all deep monitoring wells. Soil samples collected should be submitted to the laboratory for the analysis of all VOCs. The above requested work plan should include details regarding how all soil samples will be collected.



The report recommends developing a risk assessment in accordance with ADEM's most recent ARBCA guidance document. It should be noted that a risk assessment can not be performed until a minimum of 4 quarterly sampling events or 2 years of semi-annual sampling events have been completed. The above requested work plan should include a quarterly groundwater monitoring plan that includes how all monitoring wells will be purged and sampled for VOCs analysis. The plan should also include the submittal of quarterly monitoring reports to the Department.

Additionally, ADEM's ARBCA document has recently been revised. Therefore, the development of the risk assessment should be completed in accordance with the revised document (June 2007).

If there are any questions regarding this letter, please do not hesitate to contact me at 334/271-7964 or by Email at [kdk@adem.state.al.us](mailto:kdk@adem.state.al.us).

Sincerely,



Kathleen D. Keller  
Hydrogeologist  
ADEM Hydrogeology Section

KK/aw

*File: GW106/AL National Guard – Mobile/ Mobile County/GW 07-0102*