



Alabama Department of Environmental Management
adem.alabama.gov

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August 6, 2010

Mr. William Woodall
Environmental and HTRW Section
U.S. Army Corps of Engineers, Mobile District
P.O. Box 2288
Mobile, AL 36628-0001

**RE: ADEM Review and Comments: 4th Supplemental Comprehensive Investigation
Groundwater Monitoring Report, Mobile OMS 28 & 29, dated June 22, 2010.
Mobile OMS 28 & 29, Mobile County, Alabama
DSMOA ID: 535-223-0031**

Dear Mr. Woodall,

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the U.S. Army Corps of Engineers' (USACE or the Corps) subject document and has attached comments for your review and response. Please submit response comments within 45 days from the date of receipt of this letter.

If you have any questions or concerns regarding this matter, please contact Mr. Colin Mitchell of the Governmental Hazardous Waste Branch at 334-271-7967 or via e-mail at cjmitchell@adem.state.al.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen A. Cobb".

Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
Land Division

SAC/TPS/CM/mal

Cc: Melissa Shirley, US Army Corps of Engineers
Buzz Turk, Alabama National Guard
Rachel Riggins, Alabama National Guard
Alan Blake, ADEM Groundwater Branch
Tracy Strickland, ADEM Governmental Hazardous Waste Branch



ATTACHMENT
4th Supplemental Comprehensive Investigation GWMR
ADEM Review Comments
Mobile OMS 28 & 29

1. **Page 9, Section 4.2 Groundwater Analytical Results:** The tetrachloroethylene (PCE) concentration in well OMS-28-5 exceeds ADEM drinking water Maximum Contaminant Levels (MCLs). Please address.
2. **Page 9, Section 4.2 Groundwater Analytical Results:** Trichloroethylene (TCE) concentrations in wells OMS-28-3, OMS-28-5, and MW-8 exceed ADEM drinking water MCLs. Please address.
3. **Page 12, Section 6.0 Recommendations:** The Department notes that an ARBCA assessment of the OMS-28 site will be performed following the September 2010 sampling event.

Please note that the Department has recently promulgated regulations, effective May 26, 2009, to establish minimum requirements governing environmental covenants pursuant to the Alabama Uniform Environmental Covenants Act (UECA), Code of Alabama 1975, §§ 35-19-1 to 35-19-14. ADEM Admin. Code r. 335-5 is located on the ADEM website and applies to all sites that are not remediated to unrestricted use. Therefore, if PCE and TCE continue to exceed ADEM drinking water MCLs, it will be required that a covenant request, including appropriate information, be submitted along with the land use control implementation plan (LUCIP) prior to approval of the final remedy.