



DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
NATIONAL GUARD BUREAU  
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NGB-ARE-I

14 September 2010

Mr. Colin Mitchell  
Government Hazardous Waste Branch  
P.O. Box 301463  
Montgomery, AL 36130-1463

Dear Mr. Mitchell:

Thank you for your letter dated 6 August 2010 providing comments on the 4th Supplemental Comprehensive Investigation Groundwater Monitoring Report dated June 2010. Our responses to your comments are attached for your review.

If you have any questions or comments, please me at 703-607-7980.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Elliott".

Glenn Elliott  
ARNG-ILE-C  
Environmental Programs Division

ADEM letter dated 6 August 2010

SUBJECT: 4<sup>th</sup> Supplemental Comprehensive Investigation Groundwater Monitoring Report, Alabama National Guard Site, Organizational Maintenance Shop (OMS-28), 1622 South Broad Street, Mobile, Mobile County, Alabama, Groundwater Incident No. GW 07-01-02

ADEM Comment 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).

USACE Response to comments 1 and 2: During this investigation, only two chemicals of concern, PCE and TCE, were detected in the shallow groundwater at concentrations that exceeded their respective ADEM drinking water PSVs; no chemicals of concern were detected in the three deep wells except for one estimated detection of acetone, which was well below PSVs. A comparison of this sampling event and previous sampling events reveals that dissolved-phase VOC concentrations have generally remained stable at the site. The next groundwater monitoring event will likely provide additional data to substantiate the stability of the plume. The plume is small (about half an acre), and the site is wooded and undeveloped. The risk to human health is minimal since there is no ingestion of or contact with the groundwater and no vapor intrusion risk.

ADEM Comment: 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.

USACE response to comment: See response 1.

ADEM Comment: 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.

USACE Response to comment 3: Following the next monitoring event to be conducted in September, we plan to prepare an Alabama Risk-Based Corrective Action (ARBCA) Report to evaluate the cumulative risk present at the site and to develop appropriate risk management levels for the site. Based on the results of the ARBCA, we will, in conjunction with ADEM, prepare a risk management plan to propose a path forward. We understand that if the site is not released for unrestricted residential use, an Alabama UECA and LUCIP will be required.