



NATIONAL GUARD BUREAU

111 SOUTH GEORGE MASON DRIVE
ARLINGTON VA 22204-1382

April 11, 2011

ARNG-ILE-C

SUBJECT: 5th 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

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

Dear Mr. Mitchell:

Thank you for your letter dated 31 March 2011 providing comments on the 5th Supplemental Comprehensive Investigation Groundwater Monitoring Report dated January 2011. Our responses to your comments are attached for your review.

If you have any questions or comments, please contact me at (703) 601-7982.

Sincerely,

A handwritten signature in black ink that reads "Michaelle M. Murger".

Michaelle M. Murger
Lieutenant Colonel
Deputy, Cleanup & Restoration Branch
Environmental Programs Division

Enclosure

cf:

Mobile Airport Authority, Mr. Thomas Hughes, P.O. Box 88004, Mobile, Alabama, 36608
State Military Dept. Joint Forces Headquarters Alabama National Guard
U.S. Army Corps of Engineers, EN-GE

Response to Comments, ADEM Letter dated 31 March 2011

SUBJECT: 5th 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: Groundwater Analytical Results: The tetrachloroethylene (PCE) concentration in well OMS-28-5 exceeded the ADEM PSV of 0.005 mg/L. Please address.

Response to Comment 1: Only two chemicals of concern, PCE and TCE, were detected in the shallow groundwater at concentrations that exceeded their respective ADEM PSVs. PCE and TCE were not detected in the deep groundwater. A comparison of this sampling event and previous sampling events reveals that dissolved-phase VOC concentrations have generally remained stable at the site. The plume is small (about half an acre), and the majority site is wooded and undeveloped.

An Alabama Risk Based Corrective Action (ARBCA) Report for the site was prepared and provided to your office on 16 March 2011. The ARBCA Report contains the evaluation of the cumulative risk present at the site and developed appropriate risk management levels for the site. The results of the risk evaluation demonstrated no current risk for human health at the site based on the current use of the property. Note that there is no current risk to human health from chemicals in groundwater because all water used on/near the property for drinking and other purposes is supplied by the Mobile Area Water and Sewer System (MAWSS) public water supply.

Based on the results of the ARBCA, we are proceeding with the preparation of a feasibility study to propose a path forward to address potential future use of the site. We understand that if the site is not released by ADEM for unrestricted residential use, an Alabama UECA and LUCIP will be required prior to approval of the final remedy.

ADEM Comment 2: The trichloroethylene (TCE) concentration in wells MW-8, OMS-28-3, and OMS-28-5 exceeded the ADEM PSV of 0.005 mg/L. Please address.

Response to Comment 2: See response to comment 1.